

**In The Matter Of:**  
*William Whitford, et al. vs*  
*Beverly R. Gill, et al.*

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*Videotaped Deposition of PATRICK E. FULLER*  
*March 29, 2019*

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IN THE DISTRICT COURT OF THE UNITED STATES FOR THE WESTERN DISTRICT OF WISCONSIN			Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 3		
=====					
WILLIAM WHITFORD, ET AL.,					
Plaintiffs,					
-vs- Case No. 3:15-cv-421-jdp					
BEVERLY R. GILL, ET AL.,					
Defendants.					
=====					
Videotaped Deposition of:					
PATRICK E. FULLER					
Madison, Wisconsin March 29, 2019					
Reported by: Taunia Northouse, RDR, CRR, CCP					
24 (Original transcript filed with Attorney Harless, copies provided to all counsel)					
25					
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1	I N D E X		1	VIDEOTAPED DEPOSITION of PATRICK E. FULLER,	
2	WITNESS		2	a witness of lawful age, taken on behalf of the	
3	PATRICK E. FULLER		3	Defendants, wherein William Whitford, et al., are	
4	Examination by Ms. Harless		4	Plaintiffs, and Beverly R. Gill, et al., are	
5	Examination by Mr. St. John		10	5 Defendants, pending in the United States District	
6			161	6 Court for the Western District of Wisconsin, pursuant	
7			21	7 to notice and subpoena, before Taunia Northouse, a	
8	E X H I B I T S		22	8 Registered Diplomatic Reporter and Notary Public in	
9	No.	Description	23	9 and for the State of Wisconsin, at the offices of the	
10	Exh 1	Subpoena	11	10 Urban Land Interests, 10 East Doty Street, in the	
11	Exh 2	Response to Plaintiffs' Requests for Production	73	11 City of Madison, County of Dane, and State of	
12	Exh 3	Plan for District 21	77	12 Wisconsin, on the 29th of March 2019, commencing at	
13	Exh 4	Plan for District 22	79	13 8:58 in the forenoon.	
14	Exh 5	Plan for District 23	81	14	
15	Exh 6	Plan for District 24	83	15 A P P E A R A N C E S	
16	Exh 7	Plan for District 26	84	16 ANNABELLE HARLESS, Attorney	
17	Exh 8	Plan for District 29	85	17 CAMPAIGN LEGAL CENTER	
18	Exh 9	Plan for District 31	86	73 West Monroe, Suite 322, Chicago, Illinois 60603, 18 appearing on behalf of the Plaintiffs.	
19	Exh 10	Plan for District 35	87	86 aharless@campaignlegalcenter.org 312-561-5508	
20	Exh 11	Plan for District 38	88	19 DOUGLAS M. POLAND, Attorney	
21	Exh 12	Plan for District 42	89	20 RATHKE WOODWARD, LLC	
22	Exh 13	Plan for District 4	90	88 10 East Doty Street, Suite 507, Madison, Wisconsin	
23	Exh 14	Plan for District 50	92	21 53703, appearing on behalf of the Plaintiffs.	
24	Exh 15	Plan for District 56	93	89 dpoland@rathkewoodward.com 608-960-7453	
25			90	22 KEVIN ST. JOHN, Attorney	
			92	23 BELL GIFTOS ST. JOHN, LLC	
			94	5325 Wall Street, Suite 2200, Madison, Wisconsin	
			94	53718-7980, appearing on behalf of Defendant	
			93	Wisconsin State Assembly.	
			93	93 kstjohn@bellgiftos.com 608-216-7990	

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<p>1 APPEARANCES CONTINUED</p> <p>2</p> <p>3 BRIAN P. KEENAN, Assistant Attorneys General</p> <p>4 STATE OF WISCONSIN DEPARTMENT OF JUSTICE</p> <p>5 17 West Main Street, Madison, Wisconsin, appearing</p> <p>6 on behalf of Wisconsin Election Commission</p> <p>7 defendants.</p> <p>8 keenanbp@doj.state.wi.us 608-266-0020</p> <p>9 Also present: Jon Hansen, videographer</p> <p>10 = = = = =</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>THE VIDEOGRAPHER: Good morning. We are on the record. This is the videotape deposition, Wisconsin State Assembly, taken on March 29, 2019. The time, 8:58. This deposition is taking place at 10 East Doty Street, Madison, Wisconsin. This is the case of William Whitford, et al., versus Gerald Nichol, et al., 15-cv-421-bbc, United States District Court, Western District of Wisconsin.</p> <p>My name is Jon Hansen, CLVS, videographer with Verbatim Reporting.</p> <p>At this time if counsel could please state their appearances for the record, after which our reporter will swear the witness and we can proceed.</p> <p>MS. HARLESS: Annabelle Harless</p>		<p>1 explained that the subpoena's addressed to</p> <p>2 the Wisconsin State Assembly, and we're</p> <p>3 providing a witness today to testify about</p> <p>4 what is known to the Wisconsin State</p> <p>5 Assembly, not to another entity.</p> <p>6 The Wisconsin State Assembly's knowledge</p> <p>7 is not an amalgam of all the knowledge</p> <p>8 possessed by individual legislators. For</p> <p>9 example, as we pointed out in the same</p> <p>10 letter, the Wisconsin State Assembly has no</p> <p>11 discoverable knowledge about campaign</p> <p>12 activities. Whatever campaign related</p> <p>13 associational activities are engaged in by</p> <p>14 Assembly members or staff in their unofficial</p> <p>15 capacity, regardless of their party</p> <p>16 affiliation, such activities are not</p> <p>17 performed for the benefit of or on behalf of</p> <p>18 the Wisconsin State Assembly.</p> <p>19 Second, the Assembly is a unique</p> <p>20 organization. Its members are 99 elected</p> <p>21 officers. They do not serve the body. They</p> <p>22 are not appointed by the body. Instead, they</p> <p>23 are elected by their constituencies and they</p> <p>24 serve their constituencies. Those members</p> <p>25 are equal to one another, having the same</p>	
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<p>1 with the Campaign Legal Center in Chicago</p> <p>2 representing the Whitford individual</p> <p>3 plaintiffs.</p> <p>4 MR. POLAND: Doug Poland of</p> <p>5 Rathje Woodward, representing the plaintiffs.</p> <p>6 MR. ST. JOHN: Kevin St. John,</p> <p>7 Bell Giftos St. John representing the</p> <p>8 Wisconsin State Assembly.</p> <p>9 MR. KEENAN: Assistant Attorney</p> <p>10 General Brian Keenan from the Wisconsin</p> <p>11 Department of Justice representing the</p> <p>12 Wisconsin Election Commission defendants.</p> <p>13</p> <p>14 PATRICK FULLER,</p> <p>15 called as a witness, being first duly sworn,</p> <p>16 testified on oath as follows:</p> <p>17 MR. ST. JOHN: Counsel, before we</p> <p>18 begin, if you don't mind, I'd like to state a</p> <p>19 couple of general objections to the notice</p> <p>20 topics and put them on the record.</p> <p>21 First, we communicated by counsel by</p> <p>22 letter dated March 15, 2019, that our</p> <p>23 objection to the deposition notice insofar as</p> <p>24 it defines the terms "you" and "your" refer</p> <p>25 to the Republican Assembly Caucus. We</p>		<p>1 voting power.</p> <p>2 As we stated in our responses to the</p> <p>3 document requests, those elected officials</p> <p>4 are the custodians of their own records under</p> <p>5 Wisconsin law. Those records are not the</p> <p>6 Assembly's but the members'. Similarly, the</p> <p>7 knowledge that individual members possess</p> <p>8 belongs to the individual members, not the</p> <p>9 State Assembly.</p> <p>10 The State Assembly cannot waive a</p> <p>11 member's privileges. In general, the State</p> <p>12 Assembly is a corporate entity, knows no more</p> <p>13 about an individual member's discussion with</p> <p>14 that member's staff or other legislators as</p> <p>15 it knows about an individual member's</p> <p>16 discussion with his or her spouse.</p> <p>17 The Assembly's knowledge of a member's</p> <p>18 legislative activity and those of member's</p> <p>19 personal staff are limited to what is</p> <p>20 disclosed to and placed before the body.</p> <p>21 Third, we object to Topics 6 and 14 as</p> <p>22 being vague and overbroad and ambiguous. As</p> <p>23 we stated in our written objections to</p> <p>24 requests for documents, we have not</p> <p>25 interpreted the term "associational"</p>	

Videotaped Deposition of PATRICK E. FULLER 3-29-19 <p>1 activities" to include work on legislative 2 bills or enactments. To the extent 3 plaintiffs intended that, that's unclear and 4 it would make those requests overbroad as it 5 would suggest that the deponent would need to 6 become familiar with the identities of, at a 7 minimum, every legislator and every 8 legislative staffer that has worked in the 9 Assembly over the past 17 years. 10 We reserve the right to make additional 11 objections to the scope and breadth of the 12 30(b)(6) topics during this deposition, as 13 well as of course privilege and form 14 objections. We reserve the right to make or 15 assert evidentiary objections at trial of 16 course. And by providing the 30(b)(6) 17 witness today, the Assembly is not intending 18 to waive any privilege possessed by its 19 members. 20 Thank you for allowing me to put that on 21 the record. 22 <b>MS. HARLESS:</b> No problem. 23 24 25</p>	Page 9	Videotaped Deposition of PATRICK E. FULLER 3-29-19 <p>1 <b>Does that make sense?</b> 2 A Yes. 3 Q <b>Could you please state your full name for the</b> 4 <b>record.</b> 5 A Patrick E. Fuller. 6 Q <b>And do you understand you're under oath today?</b> 7 A Yes. 8 Q <b>Is there any reason why you cannot give truthful</b> 9 <b>answers to my questions today?</b> 10 A No. 11 Q <b>And you're here pursuant to a subpoena; correct?</b> 12 A Yes. 13 <b>MS. HARLESS:</b> Okay. Let's mark an 14 exhibit. 15 (Exhibit No. 1 marked for 16 identification) 17 Q <b>So, Mr. Fuller, I'm handing you a document that</b> 18 <b>has been marked Exhibit 1 to this deposition.</b> 19 <b>Have you seen this document before?</b> 20 A Yes. 21 Q <b>What is Exhibit 1?</b> 22 A Say again? 23 Q <b>What is Exhibit 1? What is this document?</b> 24 A Exhibit 1's a subpoena. 25 Q <b>Since this is a specific kind of subpoena under</b></p>	Page 11
Videotaped Deposition of PATRICK E. FULLER 3-29-19 <p>1 <b>EXAMINATION</b> 2 By Ms. Harless: 3 Q <b>So good morning, Mr. Fuller. My name is</b> 4 <b>Annabelle Harless and I represent the individual</b> 5 <b>plaintiffs in this case. I'm going to be asking</b> 6 <b>you some questions today. But before I do, I</b> 7 <b>wanted to ask if you've ever been deposed before.</b> 8 A No. Yes, yes, I have. 9 Q <b>In your official capacity?</b> 10 A Yes. 11 Q <b>Okay. So we'll just go over a few ground rules</b> 12 <b>before we start just as a refresher. The court</b> 13 <b>reporter is transcribing everything we say. So</b> 14 <b>the court reporter can get everything on the</b> 15 <b>record, please wait for me to finish asking my</b> 16 <b>question before you give an answer. And then I'll</b> 17 <b>try to do the same for you so that we're not</b> 18 <b>speaking over each other.</b> 19 <b>The court reporter can only record verbal</b> 20 <b>responses. So I would just ask instead of shaking</b> 21 <b>your head or nodding your head, you give me a</b> 22 <b>verbal response.</b> 23 <b>And we can take a break at any time. I only</b> 24 <b>ask you do not take a break while a question is</b> 25 <b>pending.</b></p>	Page 10	Videotaped Deposition of PATRICK E. FULLER 3-29-19 <p>1 <b>Rule 30(b)(6) of the Federal Rules of Civil</b> 2 <b>Procedure, you're here in a representative</b> 3 <b>capacity testifying on behalf of the Wisconsin</b> 4 <b>State Assembly. Do you understand that?</b> 5 A Yes. 6 Q <b>Do you recall when you first saw a copy of the</b> 7 <b>subpoena?</b> 8 A I don't recall, no. 9 Q <b>Okay. Do you remember who gave you the subpoena?</b> 10 A The Assembly's attorney. 11 Q <b>Mr. St. John?</b> 12 A Yes. 13 Q <b>And what did you do to prepare for this deposition</b> 14 <b>today?</b> 15 A I talked to -- we did an electronic search of all 16 our records and paper copies of our records. I 17 coordinated with my journal clerk, my records 18 clerk, my business legislative specialist and my 19 officer manager, and I conferred with the Assembly 20 attorneys. 21 Q <b>Did you meet with any of those people in person?</b> 22 A Yes. 23 Q <b>Let's just take, I guess, the first -- you said</b> 24 <b>you conferred with your business and legislative</b> 25 <b>specialist. Who was present at that meeting?</b></p>	Page 12

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<p>1 A Who was present? Me and my -- me and my business legislative specialist.</p> <p>3 Q What is that person's name?</p> <p>4 A Doris Vande Loo.</p> <p>5 Q And what did you discuss at that meeting?</p> <p>6 A I asked her to check her records, both electronic and paper, and records that were -- requests that were produced to my office.</p> <p>9 Q Anything else you talked about at that meeting?</p> <p>10 A No.</p> <p>11 Q Okay. And you said you had a meeting with your office manager?</p> <p>13 A Office manager.</p> <p>14 Q Who is the office manager?</p> <p>15 A Office manager is Carol Redell.</p> <p>16 Q And what did you discuss with Carol?</p> <p>17 A To do a search of her electronic and paper records of requests that I received.</p> <p>19 Q Okay. Any other people you met with that I forgot on that list?</p> <p>21 A The journal clerk.</p> <p>22 Q Okay. What did you discuss with the journal clerk?</p> <p>24 A I had the journal clerk give me the -- the journal for Senate Bill 148 and the bill history for</p>		<p>1 A No.</p> <p>2 Q Did Senator Fitzgerald or his staff give you any documents to review?</p> <p>4 A No.</p> <p>5 Q Did you discuss your deposition with Senator Fitzgerald at all?</p> <p>7 A No.</p> <p>8 Q Did you meet with Adam Foltz in preparation for this deposition?</p> <p>10 A No.</p> <p>11 Q Did you discuss your deposition with Mr. Foltz at all?</p> <p>13 A No.</p> <p>14 Q Did Mr. Foltz give you any documents to review?</p> <p>15 A No.</p> <p>16 Q Did you meet with Todd Ottman in preparation for this deposition?</p> <p>18 A No.</p> <p>19 Q Did you discuss this deposition with Mr. Ottman?</p> <p>20 A No.</p> <p>21 Q Did Mr. Ottman give you any documents to review?</p> <p>22 A No.</p> <p>23 Q A moment ago you said you also met with the records clerk in preparation for this deposition.</p> <p>25 Q What did you discuss with the records clerk?</p>	
Videotaped Deposition of PATRICK E. FULLER 3-29-19	Page 14	Videotaped Deposition of PATRICK E. FULLER 3-29-19	Page 16
<p>1 Senate Bill 148.</p> <p>2 Q And what's the journal clerk's name?</p> <p>3 A Julie Martyn.</p> <p>4 Q And did you review any documents in preparation for this deposition?</p> <p>6 A Yes.</p> <p>7 Q What were those documents?</p> <p>8 A I reviewed the journal, the official record of the Assembly. I reviewed the bill history for Senate Bill 148. I reviewed a number of documents that were requested before I produced them, before I gave them to my attorneys.</p> <p>13 Q Okay. And did you meet with Speaker Vos in preparation for this deposition?</p> <p>15 A No.</p> <p>16 Q Did Speaker Vos or his staff give you any documents to review?</p> <p>18 A No.</p> <p>19 Q Did you discuss your deposition with Speaker Vos at all?</p> <p>21 A No.</p> <p>22 Q With any member of Speaker Vos's staff?</p> <p>23 A No.</p> <p>24 Q Did you meet with Senator Fitzgerald in preparation for this deposition?</p>		<p>1 A I had the records clerk do electronic search and paper search of her records regarding Senate Bill 148, the Assembly rules, and the state constitution as it relates to the legislature Article IV.</p> <p>6 Q And what is the records clerk's name?</p> <p>7 A The records clerk's name is -- let me think here for a second. Kay Inabnet, I-N-A-B-N-E-T.</p> <p>9 Q And how long did that meeting last?</p> <p>10 A Probably five, ten minutes.</p> <p>11 Q Any other meetings that you can think of that you had to prepare for this deposition?</p> <p>13 A Other -- other -- other than the meetings with my attorneys.</p> <p>15 Q How many meetings did you have with your attorneys?</p> <p>17 A One meeting was 40 minutes, another meeting was approximately four hours, and another meeting was 30 to 40 minutes.</p> <p>20 Q When did those meetings happen? Let's just take the one 40-minute meeting. When did that meeting occur?</p> <p>23 A That was yesterday.</p> <p>24 Q And then the four-hour meeting, when was that?</p> <p>25 A Tuesday.</p>	

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<p>1 Q <b>And then the 30- to 40-minute meeting?</b></p> <p>2 A I don't know the exact date. Sometime last week</p> <p>3 or the week before.</p> <p>4 Q <b>And only your attorneys were present at that</b></p> <p>5 <b>meeting?</b></p> <p>6 A That's correct.</p> <p>7 Q <b>And who was there? Which attorneys?</b></p> <p>8 A Kevin St. John, and I can't remember one of the</p> <p>9 other attorneys. I don't remember her name.</p> <p>10 Q <b>Was it Taylor Meehan?</b></p> <p>11 A I met two of them: one male, one female. It was</p> <p>12 an attorney from Bartlit.</p> <p>13 Q <b>Bartlit Beck?</b></p> <p>14 A Right.</p> <p>15 Q <b>Was it Josh Ackerman?</b></p> <p>16 A I met him a week prior before that.</p> <p>17 Q <b>Okay.</b></p> <p>18 A Josh was one of them, yes.</p> <p>19 Q <b>Okay. Besides those meetings, are there any other</b></p> <p>20 <b>conversations you had to prepare for this</b></p> <p>21 <b>deposition?</b></p> <p>22 A No.</p> <p>23 Q <b>Are there any other communications you've had with</b></p> <p>24 <b>anyone to prepare for this deposition?</b></p> <p>25 A No.</p>		<p>1 that are in the Assembly rule book under Assembly</p> <p>2 Rule 5. I can't remember all of them. But</p> <p>3 primarily chief financial officer, chief</p> <p>4 administrative officer. We track all the</p> <p>5 legislation from cradle to grave.</p> <p>6 Q <b>What do you do as chief financial officer?</b></p> <p>7 A The chief financial officer, I maintain the budget</p> <p>8 for the Assembly. I ensure all members, to</p> <p>9 include legislators and their respective staffs,</p> <p>10 are paid. And I work with the Legislative Fiscal</p> <p>11 Bureau on the Assembly budget.</p> <p>12 Q <b>Anything else you do as chief financial officer?</b></p> <p>13 A Those are the things that come off the top of my</p> <p>14 mind right now.</p> <p>15 Q <b>And what do you do as the administrative officer?</b></p> <p>16 A Chief administrative officer, I maintain all the</p> <p>17 records, the official record of the Assembly, that</p> <p>18 being the Journal for the Assembly. That's the</p> <p>19 primary -- one of the primary duties as the chief</p> <p>20 administrative officer. We maintain all the</p> <p>21 personnel records of all members of the Assembly,</p> <p>22 to include their legislative 99 elected officials.</p> <p>23 And that's primarily as the administration.</p> <p>24 Q <b>Any other job duties you can think of besides</b></p> <p>25 <b>those that you've listed?</b></p>	
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<p>1 Q <b>About how long total do you think you've spent</b></p> <p>2 <b>preparing for this deposition?</b></p> <p>3 A About seven hours, approximately seven hours.</p> <p>4 Q <b>And did you bring any documents with you today?</b></p> <p>5 A No.</p> <p>6 Q <b>What is your position with the Wisconsin State</b></p> <p>7 <b>Assembly?</b></p> <p>8 A I'm Assembly chief clerk.</p> <p>9 Q <b>How long have you held that position?</b></p> <p>10 A I've been the Assembly chief clerk since</p> <p>11 January of 2003.</p> <p>12 Q <b>What did you do before you were the chief clerk of</b></p> <p>13 <b>the Wisconsin State Assembly?</b></p> <p>14 A I was the assistant chief clerk from 2001 to 2003.</p> <p>15 Q <b>What did you do before you were the assistant</b></p> <p>16 <b>chief clerk?</b></p> <p>17 A I worked for the Department of Veterans Affairs as</p> <p>18 a troop director of the Troops for Teachers</p> <p>19 program and a veterans benefits specialist.</p> <p>20 Q <b>What are your job duties as the chief clerk of the</b></p> <p>21 <b>Assembly?</b></p> <p>22 A I'm responsible for -- I'm the chief financial</p> <p>23 officer, chief administrative officer. I maintain</p> <p>24 the official record of the Assembly, which is the</p> <p>25 Journal. There's about two pages of my duties</p>		<p>1 A I don't -- I don't remember off the top of my</p> <p>2 head, but you can review Assembly Rule 5 in the</p> <p>3 Assembly rule book. There's a large number of</p> <p>4 duties that I'm required to do. I don't know them</p> <p>5 off the top of my head. But if you want to review</p> <p>6 those, you can. They're online or we can provide</p> <p>7 one for you.</p> <p>8 Q <b>Okay. Do you interact with the speaker of the</b></p> <p>9 <b>Assembly as the chief clerk?</b></p> <p>10 A Yes. As I do with all legislators.</p> <p>11 Q <b>What do those interactions entail?</b></p> <p>12 A Staffing mainly for all legislators, both -- for</p> <p>13 both parties, budget. I brief the -- I don't</p> <p>14 brief the speaker per se, but I brief his chief of</p> <p>15 staff on the budget, where we are on a monthly</p> <p>16 basis, staffing on a monthly basis.</p> <p>17 Q <b>And do you interact with the majority leader of</b></p> <p>18 <b>the Senate as chief clerk of the Assembly?</b></p> <p>19 A No.</p> <p>20 Q <b>Have you been involved in any other litigation in</b></p> <p>21 <b>your role as chief clerk?</b></p> <p>22 A Yes.</p> <p>23 Q <b>What -- what litigation was that?</b></p> <p>24 A Act 10 and the caucus investigation.</p> <p>25 Q <b>So let's start with Act 10. How were you involved</b></p>	

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<p>1    <b>in that litigation?</b></p> <p>2 A I was deposed by attorneys for the protesters on</p> <p>3    what I knew was going on with the meetings with</p> <p>4    DOA and the Capitol police and so on.</p> <p>5 Q <b>Did you -- was there a trial in that case?</b></p> <p>6 A I'm not sure if there was a trial or not. I</p> <p>7    wasn't involved in a trial.</p> <p>8 Q <b>Okay. You didn't testify at trial?</b></p> <p>9 A No.</p> <p>10 Q <b>Do you remember what the gist of your testimony was at your deposition?</b></p> <p>11 A Yeah. They were looking for notes regarding any</p> <p>12    meetings that the governor's chief of staff had</p> <p>13    with members of the Capitol police and so on.</p> <p>15 Q <b>And then you were also involved in the caucus investigation litigation?</b></p> <p>17 A Yes.</p> <p>18 Q <b>What was your involvement with that litigation?</b></p> <p>19 A I was brought to trial and asked -- I was asked</p> <p>20    about the policy manual, the Assembly's policy</p> <p>21    manual, how it came about. Since I was just</p> <p>22    coming on board when that -- when that</p> <p>23    investigation trial came about, my involvement was</p> <p>24    how the policy was formulated, what are the</p> <p>25    procedures for the Assembly.</p>		<p>1    amendments to the Assembly.</p> <p>2 Q <b>That was the first time you heard about it or knew about it?</b></p> <p>4 A Well, I knew that the Senate had -- had the bill.</p> <p>5 It was Senate Bill 148. And it was introduced</p> <p>6    into the Senate by the Senate Organization</p> <p>7    Committee on 11 July 2011. We knew that bill</p> <p>8    would be coming over to the Assembly sometime.</p> <p>9 Q <b>Okay. So let's take a look again at Exhibit 1 that you have in front of you. And if you flip back a couple pages, there's a section that says Exhibit A. And so I'll refer to that as Exhibit 1-A because it's part of Exhibit 1.</b></p> <p>14    <b>Have you seen Exhibit 1-A before?</b></p> <p>15 A Yes.</p> <p>16 Q <b>What is Exhibit 1-A?</b></p> <p>17 A Well, it's a number of definitions regarding</p> <p>18    Senate Bill -- or Act 43, and just an</p> <p>19    understanding of what the definitions are going</p> <p>20    forward in this deposition.</p> <p>21 Q <b>Okay. And then if you turn to page 2 of Exhibit A, do you see that there's a list of topics there?</b></p> <p>24 A Yes.</p> <p>25 Q <b>Have you had an opportunity to review the topics</b></p>	
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<p>1 Q <b>Were you deposed in that case?</b></p> <p>2 A I was brought to the trial.</p> <p>3 Q <b>But not deposed?</b></p> <p>4 A No.</p> <p>5 Q <b>Any other cases you can think of that you were involved in?</b></p> <p>7 A That's the only ones I can think off -- those are</p> <p>8    the ones that come to the top of my mind. I don't</p> <p>9    remember any other ones where I was deposed.</p> <p>10 Q <b>Are you familiar with 2011 Wisconsin Act 43?</b></p> <p>11 A Yes.</p> <p>12 Q <b>And if I just call it Act 43 going forward, will you understand --</b></p> <p>14 A Yes.</p> <p>15 Q <b>-- what I'm saying? Okay. What is Act 43?</b></p> <p>16 A Act 43 is the requirement by the constitution</p> <p>17    Article IV Section 6 that the legislature do</p> <p>18    reapportionment every ten years. Act 43 was the</p> <p>19    bill or -- Act 43, previously Senate Bill 148 --</p> <p>20    to bring about the requirement by the constitution</p> <p>21    for redistricting.</p> <p>22 Q <b>When did you first become aware of Act 43?</b></p> <p>23 A When it was -- actually when the Assembly received</p> <p>24    Senate Bill 148 from the Senate on July 20th,</p> <p>25    2011. It was messaged from the Senate with</p>		<p>1    <b>that are identified in Exhibit 1-A for your deposition today?</b></p> <p>3 A Yes.</p> <p>4 Q <b>Were you asked to do any research or investigation regarding these topics?</b></p> <p>6    <b>MR. ST. JOHN:</b> I'm going to object</p> <p>7    to that to the extent that it calls for</p> <p>8    communications between the deponent and the</p> <p>9    attorney -- his attorneys.</p> <p>10 Q <b>You can answer yes or no.</b></p> <p>11 A I think my attorney already answered for me.</p> <p>12 Q <b>I'm only -- so a yes or no answer isn't asking for privileged information.</b></p> <p>14 A Yes, I did do research.</p> <p>15 Q <b>And what was that research?</b></p> <p>16 A I talked to my staff, as I previously mentioned,</p> <p>17    and we did electronic search and paper search of</p> <p>18    our records.</p> <p>19 Q <b>Okay. And so we'll talk a little bit about the records search later, but I just want to get an idea of what you did to prepare to testify about each of these topics today. So let's start with Topic 1. And the topic is "The objectives and/or motivations for the drawing of each district in</b></p>	

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<p>1       <b>2011 Wisconsin Act 43, including earlier drafts."</b></p> <p>2       <b>Do you see that?</b></p> <p>3 A   Yes.</p> <p>4 Q   <b>Are you prepared to testify about this topic today?</b></p> <p>5 A   Yes.</p> <p>7 Q   <b>What did you do to prepare specifically to testify on Topic 1?</b></p> <p>9 A   Once again, we did a search of our records and -- and my staff -- both paper and electronic. And I talked to the journal clerk specifically. And I also looked at the bill history.</p> <p>13 Q   <b>So the only person you met with to prepare for this is the journal clerk?</b></p> <p>15       <b>MR. ST. JOHN:</b> Object. Form.</p> <p>16 Q   <b>Is the only person you met with to prepare to testify about this topic the journal clerk?</b></p> <p>18 A   The journal clerk and the records clerk.</p> <p>19 Q   <b>And did you take any notes at any of the meetings you had with those individuals?</b></p> <p>21 A   Yes.</p> <p>22 Q   <b>Do you still have those notes?</b></p> <p>23 A   Yes. They're on my desk.</p> <p>24 Q   <b>And did you do anything else to prepare to testify about Topic 1 today?</b></p>		<p>1 A   Correct.</p> <p>2 Q   <b>Who were those individuals?</b></p> <p>3 A   Once again, the journal clerk and the records clerk.</p> <p>5 Q   <b>What did you talk about with the journal clerk?</b></p> <p>6 A   I had the journal clerk once again bring me the bill history and the Journal for Senate Bill 148 which became -- later became Act 43.</p> <p>9 Q   <b>And what did you talk about with the records clerk?</b></p> <p>11 A   We just went over to make sure everything in the Journal matched up with the -- with the bill history, which it did.</p> <p>14 Q   <b>And did you review any documents at that meeting?</b></p> <p>15 A   No. There was no documents. We did a search of paper documents and electronic documents. And the only documents I received from my staff, specifically the journal clerk, was the bill history and the Assembly Journal.</p> <p>20 Q   <b>Did you have any conversations with anyone else to prepare to testify?</b></p> <p>22 A   No. Other than my -- other than my Assembly attorneys.</p> <p>24 Q   <b>Okay. And at the meeting you had with the journal clerk, did you take any notes?</b></p>	
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<p>1       <b>MR. ST. JOHN:</b> I'm going to just object to the extent that your question is seeking the content of communications that Mr. Fuller had with his attorneys.</p> <p>5       I'm going to instruct you not to disclose the content of those communications, but you are free to disclose the fact of those communications.</p> <p>9 Q   <b>So besides any conversations you had with your attorneys, is there anything else you can think of that you did to prepare to testify on Topic 1?</b></p> <p>12 A   No.</p> <p>13 Q   <b>Let's turn to Topic 2. So this topic is "The identity of the persons involved in the drawing of each district in 2011 Wisconsin Act 43, including earlier drafts."</b></p> <p>17       <b>Are you prepared to testify about this topic today?</b></p> <p>19 A   Yes.</p> <p>20 Q   <b>What did you do to prepare to testify on Topic 2 specifically?</b></p> <p>22 A   Once again, we did talking to my staff. We did an electronic search and a paper search of any of our records regarding No. 2.</p> <p>25 Q   <b>And you met with your staff; correct?</b></p>		<p>1 A   No. I made notes right on the Journal.</p> <p>2 Q   <b>And do you still have those notes?</b></p> <p>3 A   We still have the Journal. The Journal's online, yes.</p> <p>5 Q   <b>So your notes were -- how did you take notes on that?</b></p> <p>7       <b>MR. ST. JOHN:</b> Form. Objection.</p> <p>8       Form.</p> <p>9 Q   <b>If the Journal's online, how did you take notes?</b></p> <p>10 A   I had it printed out.</p> <p>11 Q   <b>So you wrote notes on the paper?</b></p> <p>12 A   Yes.</p> <p>13 Q   <b>And in your meeting with the records clerk, did you take notes?</b></p> <p>15 A   No, no notes from the records clerk other than her giving me the constitution, Article IV Section 6.</p> <p>17 Q   <b>Anything else you can think of that you did to prepare to testify about Topic 2?</b></p> <p>19 A   No. That's it.</p> <p>20 Q   <b>So let's go to Topic 3. This topic is "The objective facts that any Assembly Persons had access to or relied on when drawing each district in 2011 Wisconsin Act 43, including earlier drafts."</b></p> <p>25       <b>Are you prepared to testify about this topic</b></p>	

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1 Q <b>today?</b>		1 A I'm sure I did. There's -- the notes that I've	
2 A Yes.		2 taken were probably, most likely on the -- the	
3 Q <b>What did you do to prepare to testify on Topic 3?</b>		3 bill history and the Assembly Journal.	
4 A Once again, I talked to the journal clerk. I		4 Q <b>And just so I can understand, did you have</b>	
5 talked to the records clerk, had them do -- and my		5 <b>separate meetings to discuss each of these topics,</b>	
6 office manager do a search of records, both paper		6 <b>or was it one meeting?</b>	
7 and electronic, regarding Senate Bill 148 and		7 A One meeting.	
8 Wisconsin Act 43.		8 Q <b>Was that -- earlier we referred -- you referred to</b>	
9 Q <b>And do you have any notes from your meeting with</b>		9 <b>a couple meetings you had. Which meeting would</b>	
10 <b>the journal clerk?</b>		10 <b>that have been?</b>	
11 A No, just as I previously stated, those notes were		11 A No. Those are separate.	
12 put on the Assembly Journal.		12 Q <b>Okay. So how long was this meeting that you had</b>	
13 Q <b>But the Assembly Journal was printed out; correct?</b>		13 <b>to discuss these topics?</b>	
14 A Correct.		14 A I don't know; 30, 40 minutes maybe.	
15 Q <b>And you wrote on that?</b>		15 Q <b>So in the 30 to 40 minutes you met with the</b>	
16 A Yes.		16 <b>journal clerk and the records clerk, you discussed</b>	
17 Q <b>So do you still have that copy of the paper that</b>		17 <b>all 14 of the topics?</b>	
18 <b>you wrote on?</b>		18 MR. ST. JOHN: Objection. Form.	
19 A Yes.		19 Q <b>You can answer if you understand the question.</b>	
20 Q <b>And do you have any notes from your meeting with</b>		20 A Repeat the question again.	
21 <b>the records clerk?</b>		21 Q <b>Did you -- when you met with the records clerk and</b>	
22 A The only thing from the records clerk was the		22 <b>the journal clerk, did you discuss all of the</b>	
23 constitution.		23 <b>topics?</b>	
24 Q <b>A printed-out version of the constitution?</b>		24 A Yes.	
25 A Yes.		25 Q <b>So if I ask you what you did to prepare for each</b>	
Videotaped Deposition of PATRICK E. FULLER 3-29-19	Page 30	Videotaped Deposition of PATRICK E. FULLER 3-29-19	Page 32
1 Q <b>And you didn't write on that paper?</b>		1 <b>of these topics, are any of your answers going to</b>	
2 A No.		2 <b>be different?</b>	
3 Q <b>Did you review any documents in preparation to</b>		3 A No.	
4 <b>testifying on Topic 3?</b>		4 Q <b>You did the same thing to prepare for every single</b>	
5 A Just the Assembly Journal, the bill history, and		5 <b>one of these topics?</b>	
6 Wisconsin State Constitution as it deals with the		6 A Yes.	
7 Assembly, or the legislature Act 4 (sic)		7 Q <b>Let's turn to Exhibit B then of Exhibit 1. Have</b>	
8 Section 6.		8 <b>you seen this document before?</b>	
9 Q <b>Anything else you can think of that you did to</b>		9 A Yes.	
10 <b>prepare to testify about Topic 3?</b>		10 Q <b>What is this document?</b>	
11 A Other than talking to my attorneys, no.		11 A This is a document that requests -- looking for	
12 Q <b>So let's look at Topic 4, still on page 2. That</b>		12 documents regarding -- as it relates to Wisconsin	
13 <b>topic is "Your involvement, if any, with the</b>		13 Act 43.	
14 <b>drawing, passage and/or enactment of 2011</b>		14 Q <b>When did you first see this document?</b>	
15 <b>Wisconsin Act 43."</b>		15 A Probably -- and I'm speculating here -- either	
16 <b>Are you prepared to testify about that topic</b>		16 late January, first part of February of 2019.	
17 <b>today?</b>		17 Q <b>Who gave you this document?</b>	
18 A Yes.		18 A The Assembly -- my Assembly attorneys.	
19 Q <b>What did you do to prepare to testify on Topic 4?</b>		19 Q <b>Generally, what did you do to comply with these</b>	
20 A Once again -- once again I just reviewed, after		20 <b>document production requests?</b>	
21 speaking with the journal clerk and the records		21 MR. ST. JOHN: Before Mr. Fuller	
22 clerk, just reviewing the -- the Journal		22 answers, I just want to make one note or	
23 specifically and Wisconsin Act 43 as it relates to		23 objection, which is that the response to	
24 the Journal.		24 discovery request of the Wisconsin State	
25 Q <b>Did you take any notes at any of those meetings?</b>		25 Assembly is not one of the noticed topics for	

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<p>1 the deposition of Mr. Fuller. To that end,    2 he is not -- under no obligation to prepare,    3 have no response for the State Assembly as to    4 how the State Assembly responded to those    5 documents. I'm not going to restrict him    6 from giving you information about his    7 personal knowledge about those topics, but I    8 did want to note that that is beyond the    9 scope of the topics noticed for 30(b)(6)    10 deposition.</p> <p>11 <b>Q With that objection on the record, generally to</b>  <b>12 the extent you're aware, what did you do to comply</b>  <b>13 with these document production requests?</b></p> <p>14 A I had my -- I did an electronic search and a -- a    15 paper search of any requested documents, as well    16 as I had my office manager do the same thing. She    17 also did an electronic search and a paper search    18 of any documents that were requested.</p> <p>19 <b>Q Were you given instructions on how to comply with</b>  <b>20 these document production requests?</b></p> <p>21 <b>MR. ST. JOHN:</b> I'm going to object    22 to that question. It calls for the content    23 of communications between the attorney --    24 Mr. Fuller's attorney or the State Assembly's    25 attorney and the State Assembly's chief</p>		<p>1 <b>Q How did you do the search of paper files?</b>    2 A Paper files were done on anything dealing with    3 Senate Bill 148 or Act -- Assembly Act 43.    4 <b>Q I want to understand a little bit better how you</b>  <b>5 did the search. Did you manually search through</b>  <b>6 papers?</b>    7 A Yes.    8 <b>Q Where are those papers kept?</b>    9 A They're kept in the Assembly chief clerk's office.    10 <b>Q Are there any other paper files that you searched</b>  <b>11 through?</b>    12 A I don't understand the question.    13 <b>Q Besides the paper files kept in your office, are</b>  <b>14 there any other paper files that you looked</b>  <b>15 through?</b>    16 A No.    17 <b>Q What about your office manager?</b>    18 A Office manager, yes. She has paper copies. When    19 you answered -- when you asked the question in my    20 office, the office manager is my -- part of my    21 office.    22 <b>Q Earlier you told me that you did an electronic and</b>  <b>23 paper search and that your office manager did an</b>  <b>24 electronic and paper search.</b>    25 A That's correct.</p>	
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<p>1 clerk. So to the extent that that question    2 calls for the content -- requires the answer    3 the content of communication -- I think that    4 the way the question is formed it does -- I    5 am going to object and instruct the witness    6 not to answer. If you want to try the    7 question again to make sure that you're not    8 asking for content, I can --</p> <p>9 <b>MS. HARLESS:</b> I'm not asking for    10 content.</p> <p>11 <b>Q I'm just asking: Were you given instructions at</b>  <b>12 all on how to comply with these document</b>  <b>13 production requests, yes or no?</b></p> <p>14 A Yes.</p> <p>15 <b>Q And who gave you those instructions?</b></p> <p>16 A My Assembly attorneys.</p> <p>17 <b>Q Were they written instructions or were they given</b>  <b>18 to you orally?</b></p> <p>19 A Orally.</p> <p>20 <b>Q And who -- did you show the subpoena itself to</b>  <b>21 anyone in your office?</b></p> <p>22 A No.</p> <p>23 <b>Q And you said you did a search of electronic files</b>  <b>24 and paper files; correct?</b></p> <p>25 A That's correct.</p>		<p>1 <b>Q So did your office manager search the same paper</b>  <b>2 files as you?</b>    3 A She searched the paper files that she has.    4 <b>Q Okay. And those are contained within your office?</b>    5 A Yes.    6 <b>Q And what files did you search for the electronic</b>  <b>7 search?</b>    8 A If I'm -- correct me if I'm wrong. What do you    9 mean, email?    10 <b>Q You told me earlier that you did an electronic</b>  <b>11 search.</b>    12 A That's correct.    13 <b>Q I'm just trying to understand what that electronic</b>  <b>14 search was.</b>    15 A Electronic search is of, once again, any documents    16 related to Wisconsin Act 43, mainly emails we    17 would receive -- would have received regarding    18 Act 43 or open records requests.    19 <b>Q Did you look through any of the individual</b>  <b>20 Assembly members' files?</b>    21 A No.    22 <b>Q As chief clerk of the Assembly, do you have access</b>  <b>23 to individual member's documents?</b>    24 A No.    25 <b>Q Do you have access to the files of individual</b></p>	

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<p>1   <b>member's offices?</b></p> <p>2 A No.</p> <p>3 Q <b>Could you access individual member's documents or files?</b></p> <p>4 A No.</p> <p>5 Q <b>Sitting here today, do you know whether any individual member of the Assembly has any documents responsive to any of these document requests?</b></p> <p>6 A I couldn't tell you that one way or the other.</p> <p>7 Q <b>Do you know whether any individual Assembly member's offices have any documents responsive to any of these document requests?</b></p> <p>8 A I don't know.</p> <p>9 Q <b>Does your office -- you said your office played some role with open records requests; correct?</b></p> <p>10 A Correct.</p> <p>11 Q <b>What is that role?</b></p> <p>12 A All open records come through the clerk's office for processing only. Individual offices cannot accept money for open records requests, so it comes through the clerk's office.</p> <p>13 Q <b>What does processing entail?</b></p> <p>14 A Processing is if an individual requests an open records request, then that office sends it over to</p>		<p>1 A Most likely offices, because each office is their own custodian of their own records. And our H.R. Department, which is part of legislative human resources, maintains personnel files of all members of the Assembly.</p> <p>2 Q <b>So are the files that you maintain custody over electronic files?</b></p> <p>3 A Electronic files as it deals with my office, per diem in district miles, travel as an example, Assembly rules.</p> <p>4 Q <b>What about the Assembly Journal online?</b></p> <p>5 A Assembly Journal, we're responsible for that, the official record and the Assembly policy manual.</p> <p>6 Q <b>Does any other state office maintain custody of Assembly records?</b></p> <p>7 A No. The Assembly is the -- is the official record. We maintain all the records for the Assembly. And one of those is the official record, that being the Journal.</p> <p>8 Q <b>Does any other state office maintain custody of individual member's records?</b></p> <p>9 A No. Each representative is a custodian of his own records. They maintain them themselves. The only other records that are maintained are by our Human</p>	
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<p>1 us in paper copies by the policy 15 cents per page if they want to pay for them, or they can come to the office and review them and take whatever they -- they would like as far as the open records request goes.</p> <p>2 Q <b>Does your office search through individual member's files to respond to open records requests?</b></p> <p>3 A No.</p> <p>4 Q <b>Does your office prepare responses to open records requests?</b></p> <p>5 A The only response we would say -- that we would respond to an open records request, that the open -- your open records request is ready for pickup and this is the cost. We do an invoice form.</p> <p>6 Q <b>Does your office do anything else relating to open records request that you can think of?</b></p> <p>7 A No, not that I can think of.</p> <p>8 Q <b>As chief clerk of the Assembly, do you maintain custody of all of the Assembly records?</b></p> <p>9 A The official records of the Assembly, we maintain about 99 percent of the Assembly records.</p> <p>10 Q <b>Who maintains the other 1 percent that you don't maintain custody of?</b></p>		<p>1 Resource Department which supports the legislature.</p> <p>2 Q <b>Does the Legislative Technology Services Bureau maintain any kind of records for individual Assembly members?</b></p> <p>3 A Not individual Assembly members, other than the inventory of computers and electronic equipment assigned to each office.</p> <p>4 Q <b>Were you involved in any document collection or production in the Baldus litigation?</b></p> <p>5 A No. No -- no documents were required from the clerk's office.</p> <p>6 Q <b>Have you ever seen any of the documents contained on the nine legislative hard drives turned over by the legislature in the Baldus litigation?</b></p> <p>7 A No.</p> <p>8 Q <b>Now let's go through these document production requests individually. So the first request in Exhibit 1-B asks for "All documents, including but not limited to email, concerning any analyses, data, plans, procedures, memos, and/or reports used by state legislative staff -- state legislators and/or any consultants or experts in the planning, development, negotiation, drawing, revision, or redrawing of the maps codified in</b></p>	

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<p>1   <b>2011 Wisconsin Act 43 or any other potential State</b></p> <p>2   <b>Assembly plan that was not adopted."</b></p> <p>3           <b>MR. ST. JOHN:</b> I'm just going to 4           restate my objection here that the response 5           to document productions is not one of the 6           topic -- not one of the noticed 30(b)(6) 7           topics. The deponent is under no obligation 8           to prepare a response on behalf of the 9           Assembly for how documents were gathered. I 10          am not instructing him not to answer. He's 11          free to answer on his personal knowledge.</p> <p>12          With counsel's acceptance, I'd like an 13          acknowledgment that this standing objection 14          can be made to all of your questions that 15          relate to Exhibit B, that he's providing 16          testimony in his -- on his personal knowledge 17          about those topics.</p> <p>18          <b>MS. HARLESS:</b> Sure. You can make 19          that standing objection.</p> <p>20          <b>MR. ST. JOHN:</b> Do I have your 21          agreement that I don't have to interrupt 22          every single question that relates to this?</p> <p>23          <b>MS. HARLESS:</b> Yes. I'd appreciate 24          that.</p> <p>25          <b>MR. ST. JOHN:</b> Thank you.</p>		<p>1           the official -- official Journal for Wisconsin 2           Act 43 and the bill history.</p> <p>3   <b>Q</b> <b>So you also don't know if any individual member's</b> 4   <b>offices have any documents that may be responsive</b> 5   <b>to this request?</b></p> <p>6   <b>A</b> No.</p> <p>7   <b>Q</b> <b>Let's move on to Request No. 2. I'll give you a</b> 8   <b>second to read that. And did you search for</b> 9   <b>documents that meet this request?</b></p> <p>10   <b>A</b> Yes.</p> <p>11   <b>Q</b> <b>What did you do to search for those documents?</b></p> <p>12   <b>A</b> Once again, I had my -- myself, I did an email 13          search of all my files, electronic search and 14          paper search, as well as I had my office manager 15          do the same thing. Mainly this would come up on 16          open records requests.</p> <p>17   <b>Q</b> <b>And were there any particular search terms that</b> 18   <b>you used to look for those documents?</b></p> <p>19   <b>A</b> Wisconsin Act 43, Senate Bill 148.</p> <p>20   <b>Q</b> <b>Anything else?</b></p> <p>21   <b>A</b> That's it. Once we come back, on No. 2 is the 22          Assembly Journal would come up and the bill 23          history for Senate Bill 148 or Wisconsin Act 43.</p> <p>24   <b>Q</b> <b>Did you produce any documents that met this</b> 25   <b>request to your attorney?</b></p>	
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<p>1           <b>MS. HARLESS:</b> Thank you.</p> <p>2   By Ms. Harless:</p> <p>3   <b>Q</b> <b>Did you search for any documents that meet this</b> 4   <b>request?</b></p> <p>5   <b>A</b> Yes.</p> <p>6   <b>Q</b> <b>Did anyone help you search for documents that meet</b> 7   <b>this request?</b></p> <p>8   <b>A</b> My -- I had my office manager go through her 9          electronic files and her paper copies.</p> <p>10   <b>Q</b> <b>How did you go about searching for documents that</b> 11   <b>were responsive to the subpoena?</b></p> <p>12   <b>A</b> We did an email search and we did a paper search, 13          specifically by the -- by Act 43 or Assembly 14          Bill 148.</p> <p>15   <b>Q</b> <b>Are those the search terms you used?</b></p> <p>16   <b>A</b> Yes. On the specific one, yes.</p> <p>17   <b>Q</b> <b>And did you produce any documents that met this</b> 18   <b>request to your attorney?</b></p> <p>19   <b>A</b> No.</p> <p>20   <b>Q</b> <b>So sitting here today, do you know if any</b> 21   <b>individual member of the Assembly has any</b> 22   <b>documents that may be responsive to this request?</b></p> <p>23   <b>A</b> I don't know if any legislator or staff member 24          representative have any information whatsoever.</p> <p>25   The only thing I have is the bill -- the Journal,</p>		<p>1   <b>A</b> No. He had already received the -- the bill 2          history and the Journal.</p> <p>3   <b>Q</b> <b>From you?</b></p> <p>4   <b>A</b> He also went online and picked it up, but I gave 5          him an extra copy.</p> <p>6   <b>Q</b> <b>Do you know if any individual member of the</b> 7   <b>Assembly has any documents that might be</b> 8   <b>responsive to this request?</b></p> <p>9   <b>A</b> No. I have no idea what each legislator or their 10          staff has.</p> <p>11   <b>Q</b> <b>What about any individual member's offices?</b></p> <p>12   <b>A</b> That's the same thing. I wouldn't know what's in 13          their offices. It's not a requirement of the 14          Assembly to know that.</p> <p>15   <b>Q</b> <b>Besides the hard drives or the documents produced</b> 16   <b>in the Baldus litigation, are you aware of any</b> 17   <b>other documents in the Assembly's possession,</b> 18   <b>custody, or control that relate to the motives of</b> 19   <b>state lawmakers in the drawing of Act 43?</b></p> <p>20   <b>A</b> No.</p> <p>21           <b>MR. ST. JOHN:</b> I'm going to object 22          to form. You can answer the question.</p> <p>23   <b>A</b> No.</p> <p>24   <b>Q</b> <b>Let's turn back to Exhibit 1-B and turn to Topic</b> 25   <b>No. 3. Topic 3 requests "All documents, including</b></p>	

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<p>1 but not limited to email, concerning the objective 2 facts that legislative staff and/or any experts or 3 consultants referenced, used or relied upon or had 4 available to them in the planning, development, 5 negotiation, drawing, revision, or redrawing of 6 the maps codified in 2011 Wisconsin Act 43 or any 7 other potential State Assembly plan that was not 8 adopted."</p> <p>9 Did you search for documents that meet this 10 request?</p> <p>11 A Yes.</p> <p>12 Q And did anyone help you search for documents that 13 meet this request?</p> <p>14 A My office manager.</p> <p>15 Q For all of these document requests, did you search 16 for documents along with your office manager?</p> <p>17 A Office manager and I had the journal clerk.</p> <p>18 Q Which of these topics did the journal clerk also 19 search for?</p> <p>20 A I had the journal clerk check for any executive 21 branch reports that are required by the 22 legislature, and none of those turned up regarding 23 Act 43.</p> <p>24 Q For each of these topics or only for some of them?</p> <p>25 A I had her do a broad search. I didn't have her go</p>		<p>1 copy of any engagement letter, contract, 2 agreement, or other document reflecting the 3 Wisconsin State Assembly's retention or engagement 4 of Bartlit Beck LLP to serve as its legal counsel 5 in Whitford versus Gill, Case No. 15-cv-421-jdp 6 pending in the U.S. District Court for the Western 7 District of Wisconsin."</p> <p>8 Did you search for documents that meet this 9 request?</p> <p>10 A Yes.</p> <p>11 Q And did your office manager help you?</p> <p>12 A Yes.</p> <p>13 Q What did you do to search for documents that meet 14 this request?</p> <p>15 A Once again, we did an electronics -- electronic 16 search and paper search.</p> <p>17 Q And did you produce any documents that meet this 18 request to your attorney?</p> <p>19 A Yes.</p> <p>20 Q Do you know if your attorney produced any 21 documents responsive to this request to 22 plaintiffs' counsel?</p> <p>23 A I have no idea what my attorney produced.</p> <p>24 Q As chief clerk to the Assembly, were you involved 25 in any way with any requests asking for a copy of</p>	
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<p>1 down to each one of these. I gave her a wide 2 search parameter and I had her search, and nothing 3 came up.</p> <p>4 Q And did you do anything different than what you've 5 told me you've done for the other topics --</p> <p>6 A No.</p> <p>7 Q -- in searching for documents? And did you 8 produce any documents that met this request to 9 your attorney?</p> <p>10 A Not that I recall. I don't think I -- No. 3, I 11 didn't produce any -- any documents for No. 3. 12 None were available.</p> <p>13 Q Are you aware of any other documents in the 14 Assembly's possession, custody or control that 15 relate to the objective facts considered by 16 legislative staff in the drawing of Act 43?</p> <p>17 A The Assembly does not have any information on what 18 individual offices or legislative staff have in 19 their possession. But the Assembly does not have 20 any other documents.</p> <p>21 Q All right. So let's look at the next one which is 22 No. 4. That request asks for "Any and all 23 requests that you, your office, or anyone employed 24 by you or your office received to provide to the 25 requesting person or to release to the public a</p>		<p>1 the Assembly's engagement letter with the law firm 2 Bartlit Beck?</p> <p>3 A Yes.</p> <p>4 Q How?</p> <p>5 A On an open records request.</p> <p>6 Q And what -- what was your role in that open 7 records request?</p> <p>8 A To provide the contract to the requesting party 9 and any funds -- funds that were expended to pay 10 for the attorneys.</p> <p>11 Q The open records request asked about the funds 12 expended to pay for the attorneys?</p> <p>13 A Yes.</p> <p>14 Q And you had to give them a number?</p> <p>15 A Yes.</p> <p>16 Q Who was the requesting party?</p> <p>17 A A number of press -- press outlets. I think there 18 were three or four of them. I can't name them 19 all -- I think the Wisconsin State Journal was one 20 of them, and some private citizens that I don't 21 recall their names. There were about six or seven 22 requests for the contract and the funds expended 23 to pay for those -- for those attorneys.</p> <p>24 Q Are any of those responses available publicly?</p> <p>25 A I don't understand what you mean. If you want an</p>	

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<p>1 open records request, I can give that to you.</p> <p>2 Q <b>Well, we asked for the open records requests as</b></p> <p>3 <b>part of this document production request.</b></p> <p>4 MR. ST. JOHN: Counsel, is there a</p> <p>5 question? Objection. Form.</p> <p>6 MS. HARLESS: Yeah, I had asked a</p> <p>7 question.</p> <p>8 Q <b>So are the responses that the Assembly produced in</b></p> <p>9 <b>response to these open records requests publicly</b></p> <p>10 <b>available?</b></p> <p>11 MR. ST. JOHN: Can you please</p> <p>12 repeat the question.</p> <p>13 (Question read)</p> <p>14 MR. ST. JOHN: Objection. Form.</p> <p>15 The question --</p> <p>16 Q <b>Do you understand the question?</b></p> <p>17 A No, I don't understand it.</p> <p>18 Q <b>Did the Assembly respond to any of these open</b></p> <p>19 <b>records requests?</b></p> <p>20 A Yes.</p> <p>21 Q <b>Are those responses publicly available?</b></p> <p>22 A They were available to the requester. We provided</p> <p>23 them to the requester.</p> <p>24 Q <b>Does the Assembly post those responses online</b></p> <p>25 <b>anywhere?</b></p>		<p>1 asked -- initially asked for the contract, and my</p> <p>2 initial response is I didn't have the contract.</p> <p>3 And then I want to say ten days later, last part</p> <p>4 of December, first part of July (sic), I received</p> <p>5 the contract and a number of news agencies,</p> <p>6 reporters requested it, and I provided it to them.</p> <p>7 Q <b>Who did you receive the contract from?</b></p> <p>8 A I want to say Patrick Marley was one of them.</p> <p>9 Q <b>Who did you receive a copy of the contract itself</b></p> <p>10 <b>from?</b></p> <p>11 A I received a copy of the contract from the</p> <p>12 speaker's office.</p> <p>13 Q <b>But before you got that copy from the speaker's</b></p> <p>14 <b>office, you didn't have one?</b></p> <p>15 A That's correct.</p> <p>16 Q <b>Had you ever gotten any kind of invoice to pay in</b></p> <p>17 <b>relation to Bartlit Beck?</b></p> <p>18 A Yes.</p> <p>19 Q <b>But you'd never seen the contract?</b></p> <p>20 A That's correct.</p> <p>21 Q <b>So let's look at document production Request</b></p> <p>22 <b>No. 6. This asks for "Copies of any and all</b></p> <p>23 <b>documents prepared by or transmitted by the</b></p> <p>24 <b>Republican National Committee, that relate or</b></p> <p>25 <b>refer to legislative redistricting, including but</b></p>	
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<p>1 A No.</p> <p>2 Q <b>So if I wanted to get a copy of those responses,</b></p> <p>3 <b>how would I get one?</b></p> <p>4 A You just send an email to me or request them for</p> <p>5 me, and I would give them to you.</p> <p>6 Q <b>And as chief clerk of the Assembly, was your</b></p> <p>7 <b>office involved in any way in the process of</b></p> <p>8 <b>retaining Bartlit Beck to represent the Assembly</b></p> <p>9 <b>in this litigation?</b></p> <p>10 A No.</p> <p>11 Q <b>Let's turn to the next document request, which is</b></p> <p>12 <b>Request No. 5. Request No. 5 asks for "Copies of</b></p> <p>13 <b>any and all documents that you, your office, or</b></p> <p>14 <b>anyone employed by you or your office provided to</b></p> <p>15 <b>the requesting person or released to the public in</b></p> <p>16 <b>response to any requests identified in paragraph 4</b></p> <p>17 <b>above."</b></p> <p>18 I think we've covered this, but do you have</p> <p>19 anything else to add about this document</p> <p>20 production request?</p> <p>21 A No.</p> <p>22 Q <b>What exactly was your involvement in responding to</b></p> <p>23 <b>any requests asking for a copy of the Assembly's</b></p> <p>24 <b>engagement letter?</b></p> <p>25 A What I recall is one of the news -- news outlet</p>		<p>1 <b>not limited to the document attached hereto as</b></p> <p>2 <b>Exhibit 1."</b></p> <p>3 <b>Did you search for documents that met this</b></p> <p>4 <b>request?</b></p> <p>5 A Yes.</p> <p>6 Q <b>With your office manager?</b></p> <p>7 A Yes.</p> <p>8 Q <b>Did you use any particular search terms?</b></p> <p>9 A Republican National Committee, redistricting,</p> <p>10 Senate Bill 148, Wisconsin Act 43.</p> <p>11 Q <b>And did you produce any documents to your attorney</b></p> <p>12 <b>in relation to this request?</b></p> <p>13 A I'm not sure specifically on this one. If any</p> <p>14 documents came about, it was on an open records</p> <p>15 request, somebody that my office was CC'd on. But</p> <p>16 as far as a document specifically regarding</p> <p>17 redistricting and -- it was just an email that the</p> <p>18 Assembly received from one of the offices.</p> <p>19 Q <b>Does the Assembly have a policy on retaining open</b></p> <p>20 <b>records requests?</b></p> <p>21 MR. ST. JOHN: This is a slightly</p> <p>22 different question than requesting for how</p> <p>23 the document requests were responded to. So</p> <p>24 I'm just going to restate my scope of topic</p> <p>25 objection to this last question which was</p>	

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<p>1 about policy for open records requests. The 2 witness is not under a duty to prepare to 3 testify on behalf of the Assembly about the 4 Assembly's policies as they relate to open 5 records requests.</p> <p>6 But to the extent that he knows in his 7 individual capacity what that is, go ahead 8 and answer the question.</p> <p>9 <b>Q Do you know what the Assembly's policy is on</b> 10 <b>retaining open records requests?</b></p> <p>11 A The Assembly under Statute 16.61 (2)(b) is not 12 required to maintain any records on open requests 13 records. If the information is available, we will 14 provide it. Same thing with offices, the policy 15 is for the Assembly. If an office receives an 16 open records request, they will gather the 17 information. They will first acknowledge that 18 they have it. They will gather information. They 19 will send it to the chief clerk's office for 20 processing. And if we have to receive any funds 21 for that open records request, we let the 22 requester know it's available for pickup. They 23 can either pay for it or they can come and review 24 it and take what documents they want from the 25 request.</p>		<p>1 A I don't know. The Assembly has no idea what 2 individual offices have or don't have.</p> <p>3 <b>THE WITNESS:</b> Before we go any 4 further, can we take a break to get a drink 5 of water?</p> <p>6 <b>MS. HARLESS:</b> Sure.</p> <p>7 <b>THE VIDEOGRAPHER:</b> Going off the 8 record at 10 o'clock. Microphones are off. (Recess)</p> <p>10 <b>THE VIDEOGRAPHER:</b> And we're back 11 on the record at 10:09.</p> <p>12 By Ms. Harless:</p> <p>13 <b>Q So before we took a break we were talking about</b> 14 <b>document production Request No. 6. And I'd like</b> 15 <b>you to turn to the last page of Exhibit 1 that you</b> 16 <b>have in front of you. And that is Exhibit 1 to</b> 17 <b>Exhibit B. That was attached to the document</b> 18 <b>production request. Do you see that document?</b></p> <p>19 A Page 2; is that correct? At the top?</p> <p>20 Q Yes.</p> <p>21 A Yes.</p> <p>22 Q Have you seen this document before?</p> <p>23 A I can't say that I have. I know I didn't produce 24 it.</p> <p>25 Q That's correct. Do you know if you saw it</p>	
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<p>1 <b>Q You mentioned earlier that you produced a document</b> 2 <b>that was an open records request to us; right?</b></p> <p>3 A The question again?</p> <p>4 <b>Q You mentioned earlier that you produced an open</b> 5 <b>records request document to us in relation to</b> 6 <b>these document production requests?</b></p> <p>7 A Yes.</p> <p>8 <b>Q Why did you still have a copy of that?</b></p> <p>9 A The office manager had a copy of it. It was part 10 of an invoice.</p> <p>11 <b>Q Does your office maintain all invoices?</b></p> <p>12 A We maintain all invoices for the session. After 13 the two-year session all those invoices are -- I 14 don't want to say destroyed, but we don't retain 15 them.</p> <p>16 <b>Q Do you remember the date of the document that you</b> 17 <b>provided us with?</b></p> <p>18 A No, I don't remember the date.</p> <p>19 <b>Q Do you know whether any individual Assembly</b> 20 <b>members have documents responsive to document</b> 21 <b>production Request No. 6?</b></p> <p>22 A No, I don't know if the offices have that.</p> <p>23 <b>Q Do you know whether individual Assembly member's</b> 24 <b>office have any documents responsive to document</b> 25 <b>request --</b></p>		<p>1 <b>attached to the subpoena?</b></p> <p>2 A Oh, yes, yes. Attached to the subpoena, correct.</p> <p>3 <b>Q Okay. Before you received this document with the</b> 4 <b>subpoena, had you ever seen this document before?</b></p> <p>5 A No.</p> <p>6 <b>Q Are you aware of any similar documents that are in</b> 7 <b>the Assembly's possession, custody, or control?</b></p> <p>8 A No.</p> <p>9 <b>Q As chief clerk of the Assembly, were you ever</b> 10 <b>involved in any conversations with the Republican</b> 11 <b>National Committee about redistricting?</b></p> <p>12 A No.</p> <p>13 <b>Q Looking at Exhibit 1 to Exhibit B, there's a</b> 14 <b>section of this document titled Roman numeral III,</b> 15 <b>Legal Preparations. Do you see that section?</b></p> <p>16 A Yes.</p> <p>17 <b>Q I'd like to direct you to bullet B which is the</b> 18 <b>following: "Litigation is expensive. Will</b> 19 <b>litigation be paid for using public or private</b> 20 <b>sources, or both?"</b></p> <p>21 <b>Have you ever had any conversations with any</b> 22 <b>member of the Assembly about the use of public</b> 23 <b>funds to pay for litigation over Act 43?</b></p> <p>24 A Yes. We received a contract.</p> <p>25 <b>Q Have you ever had any conversations with anyone?</b></p>	

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<p>1 A Other than being told this is what the contract's 2 going to be and we will pay -- we will pay the 3 contract.</p> <p>4 Q <b>And who told you that?</b></p> <p>5 A If I'm not mistaken, it was 6 Representative Fitzgerald's office who was the 7 speaker at that time.</p> <p>8 Q <b>So you're referring to Jeff Fitzgerald?</b></p> <p>9 A Representative Fitzgerald who was in the Assembly. 10 I think it's -- I think it was Jeff. He was the 11 speaker at the time.</p> <p>12 Q <b>When did -- do you remember when he gave you a 13 copy of the contract?</b></p> <p>14 A I don't remember.</p> <p>15 Q <b>And he -- did you have any other conversations 16 with him about how the contract would be paid for?</b></p> <p>17 A If I remember correctly, it was paid on a monthly 18 basis. I think we paid -- I think the Assembly 19 paid -- I don't remember -- we didn't pay a large 20 amount of money, if I can remember correctly, as 21 compared -- when I compare it to the previous 22 redistricting of 2001. It was minimal as far as I 23 was concerned, less than a million dollars -- less 24 than a half a million dollars if I'm not mistaken. 25 I want to say \$200,000 I think the Assembly paid.</p>		<p>1 A No.</p> <p>2 Q <b>What about any conversations with anyone at the 3 Republican National Committee about private funds 4 to pay for litigation over Act 43?</b></p> <p>5 MR. ST. JOHN: Object form.</p> <p>6 Q <b>Do you understand the question?</b></p> <p>7 A Yes. No.</p> <p>8 Q <b>Now further down on this document we're looking 9 at, which is the very last page, Exhibit 1 to 10 Exhibit B, the last page of this exhibit, further 11 down in that document there's a section with the 12 header Roman numeral IV, Training. Do you see 13 that section?</b></p> <p>14 A Yes.</p> <p>15 Q <b>And subbullet "a" says "The RNC can train you on 16 the use of the Maptitude for Redistricting, but 17 you will need to pay the travel expenses to come 18 to Washington, D.C."</b></p> <p>19 <b>Do you know if public funds were used to pay 20 for any individual Assembly member to travel to 21 Washington, D.C., to be trained by the RNC to use 22 redistricting software?</b></p> <p>23 A So the question is for 2010?</p> <p>24 Q <b>Yes.</b></p> <p>25 A No. The Assembly did not pay for anybody to go to</p>	
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<p>1 Q <b>Uh-huh. Have you ever had any other conversations 2 with any member of the Assembly about the use of 3 public funds to pay for litigation over Act 43?</b></p> <p>4 A No.</p> <p>5 Q <b>Not about this current case, Whitford v. Gill?</b></p> <p>6 A I get the -- repeat that question again.</p> <p>7 Q <b>Have you ever had any conversations with any 8 member of the Assembly about the use of public 9 funds to pay for litigation over Act 43?</b></p> <p>10 A When the invoices come in, they go to the 11 speakers's office. They review them. They're 12 sent down to me to pay them.</p> <p>13 Q <b>And have you had conversations with the speaker's 14 office about paying those invoices?</b></p> <p>15 A The only information I would get is by email from 16 the speaker's attorney that these are good and go 17 ahead and pay, pay our half, the Assembly's half 18 of the legal bills.</p> <p>19 Q <b>Have you ever had any conversations with anyone at 20 the Republican National Committee about the use of 21 public funds to pay for litigation over Act 43?</b></p> <p>22 A No, no.</p> <p>23 Q <b>And have you ever had any conversations with any 24 member of the Assembly about the use of private 25 funds to pay for litigation over Act 43?</b></p>		<p>1 Washington, D.C.</p> <p>2 Q <b>What about any other years?</b></p> <p>3 A We sent one individual from the speaker's office 4 to Washington, D.C., for litigation in this case, 5 and I want to say it was in 2018.</p> <p>6 Q <b>Why was an individual sent from the speaker's 7 office to Washington, D.C.?</b></p> <p>8 A It was to -- to watch the litigation regarding 9 this case.</p> <p>10 Q <b>Was that Adam Foltz?</b></p> <p>11 A No. Adam Foltz is not a member of the Assembly.</p> <p>12 Q <b>Who was the --</b></p> <p>13 A It was Steve Fawcett.</p> <p>14 Q <b>But specifically, do you know of any individual 15 Assembly member who has traveled to 16 Washington, D.C., to be trained to use 17 redistricting software?</b></p> <p>18 A No. The Assembly has not sent anybody that the 19 Assembly paid for.</p> <p>20 Q <b>So below that, bullet "b" says "CDs with the 21 training materials from the April 2010 RNC's GOP 22 Redistricting Conference are available on 23 request."</b></p> <p>24 <b>Do you know if the Assembly used public funds 25 to pay for such a CD?</b></p>	

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<p>1 A No.</p> <p>2 Q You don't know?</p> <p>3 A No, we didn't pay for any, that I know of.</p> <p>4 Q But you don't know if any individual member paid for such a CD?</p> <p>6 MR. ST. JOHN: Object. Form.</p> <p>7 Q Do you know if any individual member paid for a CD?</p> <p>9 A Used state funds? Used state funds for this?</p> <p>10 Q Yes.</p> <p>11 A No, I do not know.</p> <p>12 Q And then the last bullet point under the heading Training says "If you have questions, please call us at the RNC. That's what we're here for."</p> <p>15 Underneath that five individuals and their contacts are listed; correct?</p> <p>17 A Correct.</p> <p>18 Q Do you know any of the individuals listed here?</p> <p>19 A I don't know them personally, but I know that they came up on an open records request.</p> <p>21 Q Have you ever had any conversations with any of the individuals listed here?</p> <p>23 A No.</p> <p>24 Q And do you know of any individual member of the Assembly who has had conversations with any of the</p>		<p>1 Q Did you search for documents that met this request?</p> <p>3 A Yes.</p> <p>4 Q How did you search for documents that met this request?</p> <p>6 A I used every individual's name here, A, B, C, D, and E, and searched if we had any records relating to these individuals, both paper and electronic.</p> <p>9 Q And what files -- I know you did a paper and electronic search, but what files specifically did you search?</p> <p>12 A Open records -- our open records file.</p> <p>13 Q And did you produce any open records requests that used those names to your attorneys?</p> <p>15 A Yes.</p> <p>16 Q And do you know if those documents were produced to plaintiffs' attorney?</p> <p>18 A I don't know if they were produced or given to -- given to you.</p> <p>20 Q Okay. Has the Assembly ever paid an invoice to any of the individuals listed on that back page?</p> <p>22 A No.</p> <p>23 Q Sitting here today, do you know if any individual member of the Assembly has any communications referring to redistricting that also include any</p>	
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<p>1 people listed here?</p> <p>2 A No. The Assembly would not know what goes on in individual legislator's offices.</p> <p>4 Q And when you say you know they came up on an open records request, is that the document that you produced to us?</p> <p>7 A I don't know what was produced to you, but it's what I produced to my attorneys.</p> <p>9 Q Okay. So let's flip back to Exhibit B which is the document production request, and let's look at No. 7. And this request asks for "Copies of any and all communications, including email, that relate or refer to legislative redistricting, reflecting or referring to any of the following people or email addresses." And these are the same people that are listed on the back page, Exhibit 1; right? Exhibit 1 to Exhibit B?</p> <p>18 A On No. 7, I have A, B, C, D, and E. Those individuals? Yeah.</p> <p>20 Q Yes. Those individuals are the same individuals listed at the bottom of the page you're currently --</p> <p>23 A On page 2?</p> <p>24 Q Yes.</p> <p>25 A Yes.</p>		<p>1 of the individual names listed?</p> <p>2 A No.</p> <p>3 Q What about any individual member's staff?</p> <p>4 A I don't know what the staff --</p> <p>5 MR. ST. JOHN: Object to form.</p> <p>6 A The Assembly has no knowledge of what individual legislative staff have communicated with or what they do in their offices, to include legislators.</p> <p>9 MS. HARLESS: All right. I'd like to mark an exhibit. We'll come back to this.</p> <p>11 MR. ST. JOHN: Do you want to go off the record?</p> <p>13 MR. POLAND: Yes, let's go off the record.</p> <p>15 (Discussion off the record)</p> <p>16 MS. HARLESS: We can go back on the record.</p> <p>18 By Ms. Harless:</p> <p>19 Q Let's move on to document request No. 8, which asks for "Any and all materials reflecting or relating or referring to the April 2010 Republican National Committee's GOP Redistricting Conference, including any and all notes, summaries, minutes, agendas, papers, documents, data, computer files, CDs, training materials, or any other written or</p>	

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<p>1 electronic material prepared for, distributed at, 2 created at, or otherwise related to that 3 conference."</p> <p>4 Did you search for documents that met this 5 request?</p> <p>6 A Yes.</p> <p>7 Q What did you do to search for documents that met 8 this request?</p> <p>9 A We did an electronic search and a paper search, my 10 office manager and I, Republican National 11 Conference, GOP, redistricting conference. Those 12 are the main search -- search names that we did. 13 And we received -- we don't think we had anything 14 if I'm not mistaken.</p> <p>15 Q And you looked through electronic files and paper 16 files?</p> <p>17 A Yes.</p> <p>18 Q And you don't think you produced any documents to 19 your attorney?</p> <p>20 A I don't believe we -- we produced any documents. 21 There may have been one or two email, I don't 22 remember, with GOP, GOP redistricting or 23 Republican National Committee. And I don't 24 remember specifically.</p> <p>25 Q Do you know if any individual member of the</p>		<p>1 the document we need to reprint.</p> <p>2 A Okay.</p> <p>3 Q So we'll talk about it later.</p> <p>4 Do you know if any individual member of the 5 Assembly has files that might be responsive to 6 document request No. 9?</p> <p>7 A No.</p> <p>8 Q What about, do you know if any individual member's 9 offices have documents responsive to document 10 request No. 9?</p> <p>11 A No.</p> <p>12 Q All right. Let's go to No. 10. No. 10 asks for 13 "Any and all documents reflecting or relating or 14 referring to meetings, communications, or 15 conversations from 2002 to the present regarding 16 or relating to recruiting Republican candidates 17 for the Wisconsin State Assembly."</p> <p>18 Did you search for documents that met this 19 request?</p> <p>20 A Yes, but it's -- we would have nothing on 21 Republican -- recruiting Republican candidates 22 because it's against Assembly policy to do any of 23 that. It's considered campaign activity. And 24 it's part of the JCLO Rule of 11 October 2001 that 25 it's prohibited under the Assembly rules.</p>	
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<p>1 Assembly has any documents responsive to document 2 request No. 8?</p> <p>3 A No.</p> <p>4 Q Do you know if any individual member's offices may 5 have any documents responsive to document request 6 No. 8?</p> <p>7 A No.</p> <p>8 Q All right. Let's go to No. 9. This asks for "Any 9 and all documents reflecting or relating or 10 referring to the Redistricting Majority Project, 11 commonly referred to as REDMAP."</p> <p>12 Did you search for documents that met this 13 request?</p> <p>14 A Yes.</p> <p>15 Q What did you do to search for documents?</p> <p>16 A Did electronic and paper. My office manager and 17 myself.</p> <p>18 Q Any particular search terms that you used?</p> <p>19 A Specifically REDMAP.</p> <p>20 Q And did you produce any documents responsive to 21 this request to your attorney?</p> <p>22 A I do remember this specifically. We had one email 23 on an open records request that went to Nick -- 24 Nick Probst.</p> <p>25 Q Okay. And we'll come back to that because that's</p>		<p>1 Q But you searched -- you looked through your 2 documents anyway?</p> <p>3 A Yes.</p> <p>4 Q And did you find anything that was responsive?</p> <p>5 A No.</p> <p>6 Q Do you know who would have documents responsive to 7 this request?</p> <p>8 A No. I'm not going to speculate who would have 9 documents on this.</p> <p>10 Q Do you know if the Wisconsin Republican Assembly 11 Campaign Committee would have documents responsive 12 to this request?</p> <p>13 A Once again, I don't know what the Republican 14 committee has. I don't want to speculate. I 15 don't know one way or the other.</p> <p>16 Q Would Speaker Vos have documents responsive to 17 this request?</p> <p>18 A Once again I don't know what Speaker Vos has in 19 his office, what his staff -- staff have.</p> <p>20 Q So let's move to request No. 11. Did you search 21 for documents that met this request?</p> <p>22 A Yes.</p> <p>23 Q And did anyone help you search for documents 24 relating to this request?</p> <p>25 A My office manager.</p>	

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<p>1 Q And did you search electronic and paper files?</p> <p>2 A Yes. Yes, electronic and paper files.</p> <p>3 Q And did you use any particular search terms?</p> <p>4 A Yes. RPW specifically, Republican candidate.</p> <p>5 Q And did you find any documents that were responsive to this request?</p> <p>6 A No, I don't believe we found any documents.</p> <p>8 Q Do you know who would have documents responsive to this request?</p> <p>10 A Once again, I'm not going to speculate. No, I don't.</p> <p>12 Q Would the Republican party of Wisconsin have documents responsive to this request?</p> <p>14 A I'm not sure what the Republican party has. It's not part of the Assembly.</p> <p>16 Q Would Speaker Vos have documents responsive to this request?</p> <p>18 A Once again, I don't know what Speaker Vos would have in his office. His -- his documents are not part of the Assembly's documents. They're part of Representative Vos's office documents.</p> <p>22 Q All right. Let's move to No. 12. Did you search for documents that met this request?</p> <p>24 A Yes.</p> <p>25 Q Did you do anything different to search for</p>	<p>1 request?</p> <p>2 A Yes.</p> <p>3 Q With your office manager?</p> <p>4 A With the office manager, yes.</p> <p>5 Q And did you do paper and electronic file search?</p> <p>6 A Yes.</p> <p>7 Q And did you use any particular search terms?</p> <p>8 A "Voter registration" and "WRACC."</p> <p>9 Q Did you find any documents that were responsive to this request?</p> <p>11 A No.</p> <p>12 Q Do you know who would have documents responsive to this request?</p> <p>14 A No.</p> <p>15 Q Would Speaker Vos have any documents responsive to this request?</p> <p>17 A Once again, I don't know what Speaker Vos has in his office. It's not part of the Assembly's requirement to maintain or know what Speaker Vos has in his office.</p> <p>21 Q All right. Let's move to No. 14. Did you search for documents that met this request?</p> <p>23 A Yes.</p> <p>24 Q Did you do anything different to search for documents under this request than any of the</p>		
<p>1 documents under this request than any of the others?</p> <p>3 A No, same.</p> <p>4 Q Did you use any different search terms?</p> <p>5 A Yes.</p> <p>6 Q What search terms did you use?</p> <p>7 A We used "volunteer."</p> <p>8 Q And did you find any documents that were responsive to this request?</p> <p>10 A No.</p> <p>11 Q And do you know who would have documents responsive to this request?</p> <p>13 A No, I would not.</p> <p>14 Q Would Speaker Vos have documents responsive to this request?</p> <p>16 A Once again, I don't know what Representative -- what Speaker Vos has in his office, what documents he retains.</p> <p>19 Q Let's move to request No. 13. This request asks for "Any and all documents reflecting or relating or referring to voter registration activities that were coordinated, arranged, carried out, or funded by the RPW or Wisconsin State Assembly Campaign Committee from 2002 to the present."</p> <p>25 Did you search for documents that met this</p>	<p>1 others?</p> <p>2 A No. Both paper and electronic.</p> <p>3 Q And what search terms did you use?</p> <p>4 A We used "Republican Assembly Caucus, RPW." Those were the main terms that we used.</p> <p>6 Q Okay. And did you produce any documents to your attorney in relation to this request?</p> <p>8 A No.</p> <p>9 Q Do you know who would have documents responsive to this request?</p> <p>11 A No, I would not.</p> <p>12 Q Would Speaker Vos have documents responsive to this request?</p> <p>14 A Once again, I don't know what Speaker Vos has.</p> <p>15 Q All right. Let's look at the last one, No. 15.</p> <p>16 Did you search for documents that met this request?</p> <p>18 A Yes.</p> <p>19 Q Did you do anything different to search for documents under this request than any of the other requests?</p> <p>22 A No, other than having the journal clerk do a search on Act 43 as the records clerk also.</p> <p>24 Q And did you use any specific search terms?</p> <p>25 A We used "Act 43, communications." Those were the</p>	Videotaped Deposition of PATRICK E. FULLER 3-29-19	Page 72

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<p>1 two big ones, and "districts."</p> <p>2 Q <b>Did the journal clerk use the same search terms?</b></p> <p>3 A Yes.</p> <p>4 Q <b>Did the records clerk use the same search terms?</b></p> <p>5 A Yes.</p> <p>6 Q <b>And did you produce any documents to your attorney in relation to this request?</b></p> <p>8 A The only record came from the -- actually from the journal clerk and the records clerk. And what came up with the search term is "district" came up, the actual -- actual bill.</p> <p>12 Q <b>Do you know who would have any documents responsive to this request?</b></p> <p>14 A No.</p> <p>15 Q <b>Would Speaker Vos have any documents responsive to this request?</b></p> <p>17 A I don't know what Speaker Vos has.</p> <p>18 Q <b>Are you aware of any other documents in the Assembly's possession, custody or control that relate to the Act 43 redistricting process in any way that we've not discussed today?</b></p> <p>22 A No.</p> <p>23 <b>MS. HARLESS:</b> All right. I'm going to mark an exhibit.</p> <p>25 (Exhibit No. 2 marked for</p>		<p>1 with Topic No. 1. Can you read that topic into the record, please.</p> <p>3 A You want me to read it? Is that the question?</p> <p>4 Q <b>Yes, please.</b></p> <p>5 A "The terms 'you' or 'your' refer to the" --</p> <p>6 Q <b>No, I'm sorry, Topic No. 1 on page 2 of the -- just the next page.</b></p> <p>8 A Okay. "The objectives and/or motivations for the drawing of each district in 2011 Wisconsin Act 43 including earlier drafts."</p> <p>11 Q <b>What do you understand the word "gerrymander" to mean?</b></p> <p>13 A Gerrymandering, is that the question?</p> <p>14 Q <b>Yes.</b></p> <p>15 A My definition of gerrymandering is a term that reflects a certain party has drawn the lines to their advantage.</p> <p>18 Q <b>Do you think Act 43 is a gerrymander?</b></p> <p>19 A It's not for me to make that decision.</p> <p>20 Q <b>Do you personally think Act 43 is a gerrymander?</b></p> <p>21 <b>MR. ST. JOHN:</b> If you would like to pay for Mr. Fuller's opinion testimony, you can write a check. He can agree to take it or not. But this is a fact deposition. He's not an expert witness for us and he's not an</p>	
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<p>1 identification)</p> <p>2 <b>MR. ST. JOHN:</b> Can I have the witness look at the exhibit itself? It's probably the same document, but it's the one that's stamped.</p> <p>6 Q <b>So the court reporter just handed you a document that was marked as Exhibit 2. Have you seen this document before?</b></p> <p>9 A Yes.</p> <p>10 Q <b>Is this a true and complete copy of your responses to plaintiffs' document production requests?</b></p> <p>12 <b>MR. ST. JOHN:</b> I'm going to also -- same objection. The witness is not being produced to testify as to the Wisconsin State Assembly's document responses. It's not one of the noticed topics. Obviously the witness can testify as to his personal knowledge about the response.</p> <p>19 Q <b>As far as you are personally aware, is this a true and complete copy of your responses to plaintiffs' document production requests?</b></p> <p>22 A Yes.</p> <p>23 Q <b>All right. You can set that document to the side. So let's go back to Exhibit 1 and we'll go to the list of topics in Exhibit 1-A. So we'll start</b></p>		<p>1 expert witness for you.</p> <p>2 <b>MS. HARLESS:</b> Well, he said -- I'm not going to argue with you about it on the record.</p> <p>5 Q <b>But do you have an answer to that question, or no?</b></p> <p>6 A No. I never sat down and really studied Act 43 and all the districts.</p> <p>8 Q <b>Was County 43 motivated by partisan factors?</b></p> <p>9 A I don't know. I don't know what the individual representative's motives are. It's not part of the Assembly -- part of the Assembly what we need to know, what we need to do as far as information or documents.</p> <p>14 Q <b>Do you have any understanding of what the term "cracking" means in the context of legislative redistricting?</b></p> <p>17 A No, I have no idea.</p> <p>18 Q <b>Do you have any understanding of what the term "packing" means in the context of legislative redistricting?</b></p> <p>21 A What I've heard as packing is that a number of like-minded individuals are put into one district. They all vote one party or another. That's what I understand as packing means.</p> <p>25 Q <b>All right. So let's go through -- this topic says</b></p>	

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<p>1     "The objectives and/or motivations for the drawing 2     of each district in 2011 Wisconsin Act 43"; 3     correct? 4     A    Is that No. 1? 5     Q    Yeah. 6     A    Yes.</p> <p>7                 <b>MS. HARLESS:</b> I'm going to 8                 introduce another document. We're going to 9                 mark it as Exhibit 3.</p> <p>10                 (Exhibit No. 3 marked for 11                 identification)</p> <p>13     Q    <b>So I've handed you a document and it's marked as 14                 Exhibit 3. Do you recognize this document?</b></p> <p>15     A    No, not really unless it was in the actual bill. 16                 And I never went through the actual Senate 17                 Bill 148 to look at the whole contents of that 18                 bill. So as far as seeing plan for District -- 19                 Assembly District 21, no.</p> <p>20     Q    <b>Okay. But you understand this to be a map of 21                 Assembly District 21?</b></p> <p>22     A    Yes.</p> <p>23     Q    <b>And do you know whether this document was created 24                 by the Assembly?</b></p> <p>25     A    No, I don't know if it was created by the</p>		<p>1     is the district under the 2002 map, Assembly map, 2     and then the yellow shading is the proposed 3     district under Act 43. 4                 <b>Can you explain why the boundaries of 5                 District 21 were changed from the red outline to 6                 the yellow shading?</b></p> <p>7     A    The Assembly would not know why they did that. 8                 The Assembly has no knowledge of that. The 9                 Assembly just has the bill when it came over from 10                 the Senate -- when it was messaged to the Senate. 11                 The Assembly is required to reapportion every ten 12                 years. Why that was done, the Assembly would not 13                 know.</p> <p>14     Q    <b>Do you know whether any district boundaries were 15                 adopted in 2011 to ensure that a district would be 16                 more likely to elect a Republican candidate than 17                 the prior district?</b></p> <p>18     A    No, unless it came over in the bill, Senate 19                 Bill 148 when it was messaged from the Senate on 20                 19 July 2011. We received it on the 19th and took 21                 it up on the 20th of July 2011.</p> <p>22     Q    <b>Do you have any other information about the 23                 motivation behind the drawing of Assembly 24                 District 21?</b></p> <p>25     A    No.</p>	
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<p>1     Assembly.</p> <p>2     Q    <b>Do you know whether some other state office 3                 created this document?</b></p> <p>4     A    If this document was in the Senate Bill 148, then 5                 it came over to the Assembly on July 20th, 2011, 6                 as part of the bill, the bill, with the bill 7                 history.</p> <p>8     Q    <b>Do you know why this document was created?</b></p> <p>9     A    Well, it's created because of Article IV Section 6 10                 of the constitution as far as the legislature's 11                 requirement to redistrict every ten years.</p> <p>12     Q    <b>So I'm going to represent to you that this 13                 document was taken from an external hard drive 14                 assigned to Adam Foltz in 2010 and the computer he 15                 used for the drawing of the districts that would 16                 become Act 43. And I'm also going to represent to 17                 you that the metadata for this document shows that 18                 the date of creation was June 18th, 2011. Do you 19                 know what this document was used for?</b></p> <p>20     A    It was used for redistricting.</p> <p>21     Q    <b>Does this document show the 2002 to 2010 version 22                 of District 21 in a red outline?</b></p> <p>23     A    I see red outline on there. I don't know what it 24                 depicts.</p> <p>25     Q    Okay. I'll represent to you that the red outline</p>		<p>1     Q    <b>All right. You can put that document to the side.</b> 2                 <b>MS. HARLESS:</b> I'm going to mark 3                 another one. 4                 (Exhibit No. 4 marked for 5                 identification)</p> <p>6     Q    <b>I'm handing you a document that's been marked as 7                 Exhibit 4. Do you recognize this document?</b></p> <p>8     A    No, unless it was in the -- once again no, I 9                 don't, unless it was in the -- in the Senate 10                 Bill 148, later Act 43. Once again, I never went 11                 through the whole bill and looked at all the maps. 12                 So no.</p> <p>13     Q    <b>Okay. Do you understand this to be a map of 14                 Assembly District 22?</b></p> <p>15     A    22? Yes.</p> <p>16     Q    <b>All right. So just like the previous document, 17                 I'll represent to you that this is another 18                 document that was taken from an external hard 19                 drive assigned to Adam Foltz in 2010 in the 20                 computer he used for drafting the districts that 21                 would become Act 43. And just like the previous 22                 document, it was created on June 18th, 2011.</b></p> <p>23     <b>Do you know what this document is used for?</b></p> <p>24     A    It's used once again to meet the legislature's 25                 requirement to redistrict, reapportion every ten</p>	

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<p>1 years. And that's what this looks like.</p> <p>2 Q And just like the previous document, I'm going to</p> <p>3 represent that the red outline is the Assembly</p> <p>4 district in the 2002 map and then the yellow</p> <p>5 shading is the Assembly district under Act 43.</p> <p>6 Do you know why the boundaries of District 22</p> <p>7 were changed from the red outline to the yellow</p> <p>8 shading?</p> <p>9 A No.</p> <p>10 Q Do you have any other information about the</p> <p>11 motivations behind the drawing of Assembly</p> <p>12 District 22?</p> <p>13 A No.</p> <p>14 (Exhibit No. 5 marked for</p> <p>15 identification)</p> <p>16 Q The court reporter's marked this as Exhibit 5. Do</p> <p>17 you recognize this document?</p> <p>18 A No. If you mean is this the first time I've ever</p> <p>19 seen it?</p> <p>20 Q Yes.</p> <p>21 A Yes, this is the first time I've ever seen this</p> <p>22 document.</p> <p>23 Q And do you -- do you understand it to be a map of</p> <p>24 Assembly District 23?</p> <p>25 A Yes.</p>		<p>1 district in this area. Do you know who</p> <p>2 Sandy Pasch is?</p> <p>3 A Yes.</p> <p>4 Q Was she a Democratic member of the Assembly in</p> <p>5 2011?</p> <p>6 A Yes.</p> <p>7 Q Do you know why Sandy Pasch was paired with</p> <p>8 another incumbent in Assembly District 23 in</p> <p>9 Act 43?</p> <p>10 A No idea.</p> <p>11 Q Do you have any other information about the</p> <p>12 motivations behind the drawing of Assembly</p> <p>13 District 23?</p> <p>14 A No.</p> <p>15 (Exhibit No. 6 marked for</p> <p>16 identification)</p> <p>17 Q I'm handing you a document that's been marked as</p> <p>18 Exhibit 6. Do you recognize this document?</p> <p>19 A This is the first time I've seen this document.</p> <p>20 Q Okay. Do you understand it to be a map of</p> <p>21 Assembly District 24?</p> <p>22 A Yes.</p> <p>23 Q And I'll represent to you again that this is</p> <p>24 another document that was taken from an external</p> <p>25 hard drive assigned to Adam Foltz in 2010 and the</p>	
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<p>1 Q And then again, just like the other documents, I'm</p> <p>2 representing to you that this is a document that</p> <p>3 was taken from an external hard drive assigned to</p> <p>4 Adam Foltz in 2010, and the computer he used for</p> <p>5 drafting the districts that would become Act 43.</p> <p>6 And it was created on June 18th, 2011. Do you</p> <p>7 know what this document was used for?</p> <p>8 A It's for -- once again, it's for the legislature's</p> <p>9 requirement under Article IV Section 6 of the</p> <p>10 Wisconsin Constitution to redistrict every ten</p> <p>11 years.</p> <p>12 Q And then do you understand the red outline to be</p> <p>13 the previous Assembly district?</p> <p>14 A As what you mentioned previously that the red</p> <p>15 outline is from what, 2002?</p> <p>16 Q Yeah, and the yellow shading is the proposed</p> <p>17 Act 43 district.</p> <p>18 A Yes.</p> <p>19 Q Do you know why the boundaries of District 23 were</p> <p>20 changed from the red outline to the yellow</p> <p>21 shading?</p> <p>22 A No, I have no motive --I don't know what the</p> <p>23 motivation of the individual doing this, no.</p> <p>24 Q I'm also going to represent to you that</p> <p>25 Sandy Pasch represented the prior assembly</p>		<p>1 computer he used for drafting the districts that</p> <p>2 would become Act 43. And I'll also represent to</p> <p>3 you that the metadata shows the date of creation</p> <p>4 of this document as June 18th, 2011. And then</p> <p>5 looking at this again, it's similar to the other</p> <p>6 ones. Do you understand the red outline to be the</p> <p>7 boundaries of the 2002 Assembly District?</p> <p>8 A Yes, after you've explained it to me, yes.</p> <p>9 Q And the yellow shading is the proposed District 24</p> <p>10 in Act 43?</p> <p>11 A Yes.</p> <p>12 Q Can you explain why the boundaries of District 24</p> <p>13 were changed from the red outline to the yellow</p> <p>14 shading?</p> <p>15 A No, other than it's the requirement of the</p> <p>16 legislature to redistrict every ten years. I</p> <p>17 don't know what the motivation of the individual</p> <p>18 that produced this.</p> <p>19 Q Do you have any other information about the</p> <p>20 motivations behind the drawing of Assembly</p> <p>21 District 24?</p> <p>22 A No.</p> <p>23 (Exhibit No. 7 marked for</p> <p>24 identification)</p> <p>25 Q I'm handing you Exhibit 7. Do you recognize this</p>	

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<p>1 to be a map of Assembly District 26?</p> <p>2 A Yes.</p> <p>3 Q And I'll again represent to you that this document</p> <p>4 was taken from an external hard drive assigned to</p> <p>5 Adam Foltz in 2010, and I'm also representing to</p> <p>6 you that the metadata shows the date of creation</p> <p>7 of this document as June 18th, 2011.</p> <p>8 And do you understand the red outline to be</p> <p>9 the assembly district in the 2002 map?</p> <p>10 A Yes.</p> <p>11 Q And the yellow shading is the proposed Act 43</p> <p>12 district for Assembly District 26?</p> <p>13 A Yes.</p> <p>14 Q Can you explain why the boundaries of District 26</p> <p>15 were changed from the red outline to the yellow</p> <p>16 shading?</p> <p>17 A No, I cannot.</p> <p>18 Q Do you have any other information about the</p> <p>19 motivations behind the drawing of Assembly</p> <p>20 District 26?</p> <p>21 A No.</p> <p>22 (Exhibit No. 8 marked for</p> <p>23 identification)</p> <p>24 Q I hope you like maps. I'm handing you Exhibit 8.</p> <p>25 And do you recognize this to be a picture of</p>		<p>1 A Yes.</p> <p>2 Q And again, I'll represent to you that this</p> <p>3 document was taken from an external hard drive</p> <p>4 assigned to Adam Foltz in 2010 and 2011, and it</p> <p>5 was created on June 18th, 2011.</p> <p>6 Do you understand the red outline to be the</p> <p>7 previous assembly district of District 31 under</p> <p>8 the 2002 map?</p> <p>9 A Yes.</p> <p>10 Q And then the yellow shading is the proposed</p> <p>11 District 31 under Act 43?</p> <p>12 A Yes.</p> <p>13 Q Can you explain why the boundaries of District 31</p> <p>14 were changed from the red outline to the yellow</p> <p>15 shading?</p> <p>16 A No, I cannot.</p> <p>17 Q And do you have any other information about the</p> <p>18 motivations behind the drawing of Assembly</p> <p>19 District 31?</p> <p>20 A No.</p> <p>21 (Exhibit No. 10 marked for</p> <p>22 identification)</p> <p>23 Q I'm handing you what has been marked as</p> <p>24 Exhibit 10. Do you recognize this to be a map of</p> <p>25 Assembly District 35?</p>	
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<p>1 Assembly District 29?</p> <p>2 A Yes.</p> <p>3 Q And I'll again represent to you that this was a</p> <p>4 document that was taken from an external hard</p> <p>5 drive assigned to Adam Foltz in 2010, and it was</p> <p>6 created on June 18th, 2011. Do you understand the</p> <p>7 red outline to be the previous Assembly</p> <p>8 district 29 under the 2002 map?</p> <p>9 A Yes.</p> <p>10 Q And the yellow shading is the proposed Assembly</p> <p>11 District 29 under Act 43?</p> <p>12 A Yes.</p> <p>13 Q Can you explain why the boundaries of District 29</p> <p>14 were changed from the red outline to the yellow</p> <p>15 shading?</p> <p>16 A No, I cannot.</p> <p>17 Q And do you have any other information about the</p> <p>18 motivations behind the drawing of Assembly</p> <p>19 District 29?</p> <p>20 A No.</p> <p>21 (Exhibit No. 9 marked for</p> <p>22 identification)</p> <p>23 Q I'm handing you what the court reporter has marked</p> <p>24 as Exhibit 9. Do you recognize this be to be a</p> <p>25 map of Assembly District 31?</p>		<p>1 A Yes. Once again, as all the other exhibits, this</p> <p>2 is the first time I'm seeing this.</p> <p>3 Q And I'll represent to you that this is another</p> <p>4 document that was taken from an external hard</p> <p>5 drive assigned to Adam Foltz in 2010 and was</p> <p>6 created on June 18th, 2011. And do you understand</p> <p>7 that the red outline is the previous Assembly</p> <p>8 District 35 under the 2002 map?</p> <p>9 A Yes.</p> <p>10 Q And the yellow shading is Assembly District 35 as</p> <p>11 proposed in Act 43?</p> <p>12 A Yes.</p> <p>13 Q Can you explain why the boundaries of District 35</p> <p>14 were changed from the red outline to the yellow</p> <p>15 shading?</p> <p>16 A No, I cannot.</p> <p>17 Q And do you have any other information about the</p> <p>18 motivations behind the drawing of Assembly</p> <p>19 District 35?</p> <p>20 A No.</p> <p>21 Q All right. You can set that one aside.</p> <p>22 (Exhibit No. 11 marked for</p> <p>23 identification)</p> <p>24 Q I'm handing you what the court reporter has marked</p> <p>25 as Exhibit 11. Do you recognize this to be a map</p>	

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1 of Assembly District 38?		1 Assembly District 4?	
2 A Yes.		2 A Yes.	
3 Q And I'll represent to you that this is another		3 Q And I'll represent to you again that this is	
4 document that was taken from an external hard		4 another document that was taken from an external	
5 drive assigned to Adam Foltz in 2010, and it was		5 hard drive assigned to Adam Foltz in 2010 and was	
6 also created on June 18th, 2011.		6 created on June 18th of 2011.	
7 And do you understand the red outline to be		7 Is the red outline Assembly District 4 in the	
8 the Assembly District 38 under the 2002 map?		8 2002 Assembly map?	
9 A Yes.		9 A Is it -- are you asking me or are you telling me?	
10 Q And do you understand the yellow shading to be the		10 Q I'm asking you.	
11 proposed Act 43 district of District 38?		11 A The only thing I can tell you is what you've told	
12 A Yes.		12 me, that that's what District 4 looked like in	
13 Q Can you explain why the boundaries of District 38		13 2002 --	
14 were changed from the red outline to the yellow		14 Q Okay.	
15 shading?		15 A -- which is depicted on the map, yes.	
16 A No, I cannot.		16 Q And then the yellow shading is the proposed	
17 Q Do you have any other information about the		17 District 4 in Act 43?	
18 motivations behind the drawing of Assembly		18 A Yes.	
19 District 38?		19 Q Can you explain why the boundaries of District 4	
20 A No.		20 were changed from the red outline to the yellow	
21 (Exhibit No. 12 marked for		21 shading?	
22 identification)		22 A No.	
23 Q I'm handing you what's been marked as Exhibit 12.		23 Q Do you have any other information about the	
24 Do you recognize this to be a map of Assembly		24 motivations behind the drawing of Assembly	
25 District 42?		25 District 4?	
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1 A Yes.		1 A No.	
2 Q And I'll represent to you again that this was a		2 THE WITNESS: Do you want to take a	
3 document that was taken from an external hard		3 break here as you get that ready, put the --	
4 drive assigned to Adam Foltz in 2010 and 2011, and		4 can we take about five minutes?	
5 it was created on June 18th, 2011.		5 MS. HARLESS: Sure, we can take a	
6 Does the red outline here show the 2002		6 break.	
7 version of District 42?		7 THE VIDEOGRAPHER: Going off the	
8 A 2002, correct?		8 record at 11 o'clock. Microphones are off.	
9 Q Yep.		9 (Recess)	
10 A Yes.		10	
11 Q And the yellow shading is the Act 43 proposed		11 (Exhibit Nos. 14 through 29 marked	
12 District 42?		12 for identification)	
13 A Yes.		13 THE VIDEOGRAPHER: We're back on	
14 Q Can you explain why the boundaries of District 42		14 the record at 11:10.	
15 were changed from the red outline to the yellow		15 By Ms. Harless:	
16 shading?		16 Q So, Mr. Fuller, I'm handing you what's been marked	
17 A No.		17 as Exhibit 14. And do you recognize this as a map	
18 Q Do you have any other information about the		18 of Assembly District 50?	
19 motivations behind the drawing of Assembly		19 A This is the first time I've seen it. And once	
20 District 42?		20 again, as with all the exhibits from 3 to 13,	
21 A No.		21 first time I've seen it. I understand that it's	
22 (Exhibit No. 13 marked for		22 the legislature's requirement at Article IV	
23 identification)		23 Section 6 to redistrict every ten years.	
24 Q All right. I'm handing you what is marked as		24 Q Do you understand this to be a map of	
25 Exhibit 13. Do you recognize this to be a map of		25 Assembly District 50?	

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<p>1 A Yes.</p> <p>2 Q And I'll represent to you that this is another document that was taken from an external hard drive assigned to Adam Foltz in 2010 and was created on June 18th of 2011.</p> <p>6 And as with all the previous documents, do you still understand the representation that the red outline is the Assembly District from the 2002 map?</p> <p>10 A Yes, which you've told me is correct.</p> <p>11 Q Yep. And the yellow shading is the proposed District 50 under Act 43?</p> <p>13 A Yes.</p> <p>14 Q Can you explain why the boundaries of District 50 were changed from the red outline to the yellow shading?</p> <p>17 A No, I cannot.</p> <p>18 Q Do you have any other information about the motivations behind the drawing of Assembly District 50?</p> <p>21 A No.</p> <p>22 Q I'm going to hand you what's been marked as Exhibit 15. And do you understand this to be a map of Assembly District 56?</p> <p>25 A Once again, this is the first time I've seen this,</p>		<p>1 requirement of the state constitution Article IV</p> <p>2 Section 6.</p> <p>3 Q Any other reasons why the boundaries were changed?</p> <p>4 A No, no.</p> <p>5 Q And do you have any other information about the motivations behind the drawing of</p> <p>7 Assembly District 56?</p> <p>8 A No.</p> <p>9 Q All right. I hand you what's been marked as</p> <p>10 Exhibit 16 by the court reporter. And do you</p> <p>11 recognize this to be a map of Assembly</p> <p>12 District 63?</p> <p>13 A Once again, this is the first time I've seen this</p> <p>14 document. Looks like a proposed plan for</p> <p>15 Assembly District 63.</p> <p>16 Q And I'll represent to you that this is a document</p> <p>17 that was taken from an external hard drive</p> <p>18 assigned to Adam Foltz in 2010 and was created on</p> <p>19 June 18th of 2011.</p> <p>20 Do you still understand that the red outline</p> <p>21 is the previous version of District 63 under the</p> <p>22 2002 map?</p> <p>23 A Yes.</p> <p>24 Q And the yellow shaded area is the proposed</p> <p>25 District 63 under Act 43?</p>	
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<p>1 and I understand that it's the legislature's requirement under Act 4 Section 6 of the state constitution to conduct reapportionment, redistricting.</p> <p>5 Q Do you understand this to be a map of Assembly District 56?</p> <p>7 A 56 is written at the top of this, correct.</p> <p>8 Q And at the top left it says "Wisconsin Legislative Redistricting Draft"?</p> <p>10 A Yes.</p> <p>11 Q Do you know what that refers to?</p> <p>12 A We don't -- the Assembly doesn't have drafts. We just deal with the bill. But what this looks like is it's a proposed plan for Assembly District 56.</p> <p>15 Q Okay. And then like the other map districts, do you understand that the red outline is the Assembly District 56 under the 2002 map?</p> <p>18 A Yes.</p> <p>19 Q And the yellow shaded area is the proposed district for Assembly District 56 under Act 43?</p> <p>21 A Yes.</p> <p>22 Q And can you explain why the boundaries of District 56 were changed from the red outline to the yellow shading?</p> <p>25 A The only way I can say it was done is under the</p>		<p>1 A Yes.</p> <p>2 Q Do you know why the boundaries of District 63 were changed from the red outline to the yellow shading?</p> <p>5 A Once again, other than the legislature's requirement to -- under the constitution to do reapportionment, redistricting.</p> <p>8 Q Do you know any specific reasons why the boundaries of District 63 were changed from the red outline to the yellow shading?</p> <p>11 A No, once again, just because of the Article IV of the state constitution Section 6.</p> <p>13 Q And do you have any other information about the motivations behind the drawing of</p> <p>15 Assembly District 63?</p> <p>16 A No.</p> <p>17 Q All right. I'll hand you what's been marked as</p> <p>18 Exhibit 17. Do you recognize this to be a map of</p> <p>19 Assembly District 67?</p> <p>20 A Once again, this is the first time I've seen this, but what the paper is, it says "Plan For District 67," proposed plan.</p> <p>23 Q And I'll represent to you again that this is a document that was taken from the external hard drive assigned to Adam Foltz in 2010 and was</p>	

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<p>1 created on June 18th, 2011.</p> <p>2 Do you understand the red outline to be the</p> <p>3 boundaries of District 67 under the 2002 map?</p> <p>4 A Yes.</p> <p>5 Q And the yellow shaded area is the proposed</p> <p>6 district outline for Assembly District 67 under</p> <p>7 Act 43?</p> <p>8 A Yes.</p> <p>9 Q Can you explain why the boundaries of District 67</p> <p>10 were changed from the red outline to the yellow</p> <p>11 shading?</p> <p>12 A The only thing I could tell you is that it's</p> <p>13 required that the legislature do reapportionment</p> <p>14 under the state constitution Article IV Section 6.</p> <p>15 Q And do you have any other information about the</p> <p>16 motivations behind the drawing of</p> <p>17 Assembly District 67?</p> <p>18 A Other than what I just previously mentioned.</p> <p>19 Q Other than what you just previously mentioned?</p> <p>20 A No.</p> <p>21 Q I'll hand you what's been marked as Exhibit 18.</p> <p>22 Do you understand this to be a map of</p> <p>23 Assembly District 86?</p> <p>24 A This is a proposed plan for Assembly District 86.</p> <p>25 This is the first time I've seen this document.</p>		<p>1 document, but it looks like a plan for -- a draft</p> <p>2 for plan for District 88, yes.</p> <p>3 Q And I'll represent to you that this is another</p> <p>4 document that was taken from an external hard</p> <p>5 drive assigned to Adam Foltz in 2010 and was</p> <p>6 created on June 18th, 2011.</p> <p>7 Do you understand the red outline to be the</p> <p>8 District 88 outline in the 2002 map?</p> <p>9 A Yes.</p> <p>10 Q And do you understand the yellow shaded area to be</p> <p>11 the District 88 outline under Act 43?</p> <p>12 A Yes.</p> <p>13 Q Can you explain why the boundaries of District 88</p> <p>14 were changed from the red outline to the yellow</p> <p>15 shaded area?</p> <p>16 A The requirement by the legislature to do</p> <p>17 redistricting every ten years under Article IV</p> <p>18 Section 6, the requirement to redistrict, that's</p> <p>19 why I see Assembly Bill -- Assembly District 88.</p> <p>20 Q Do you know any other reasons why the boundaries</p> <p>21 were changed?</p> <p>22 A No.</p> <p>23 Q Do you have any other information about the</p> <p>24 motivations behind the drawing of Assembly</p> <p>25 District 86?</p>	
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<p>1 Q And I'll represent to you again that this is a</p> <p>2 document that was taken from an external hard</p> <p>3 drive assigned to Adam Foltz in 2010 and was</p> <p>4 created on June 18th of 2011.</p> <p>5 Do you understand the red outline to be the</p> <p>6 version of District 86 under the 2002 map?</p> <p>7 A Yes.</p> <p>8 Q And then the yellow shaded area is the proposed</p> <p>9 District 86 under Act 43?</p> <p>10 A Yes.</p> <p>11 Q Can you explain why the boundaries of District 86</p> <p>12 were changed from the red outline to the yellow</p> <p>13 shaded area?</p> <p>14 A The legislature's required to do redistricting,</p> <p>15 reapportionment by the state constitution</p> <p>16 Article IV Section 6. That would seem to me</p> <p>17 that's why we are doing redistricting.</p> <p>18 Q Do you have any other information about the</p> <p>19 motivations behind the drawing of</p> <p>20 Assembly District 86?</p> <p>21 A No.</p> <p>22 Q I'm going to hand you what's been marked as</p> <p>23 Exhibit 19. And do you understand this to be a</p> <p>24 map of Assembly District 88?</p> <p>25 A Once again, this is the first time I've seen this</p>		<p>1 A No.</p> <p>2 Q I'll introduce what has been marked as Exhibit 20.</p> <p>3 And do you recognize this to be a map of</p> <p>4 Assembly District 93?</p> <p>5 A From the paper once again, this is the first time</p> <p>6 I've seen it, on the redistricting draft for</p> <p>7 District 93. Yes, this is the first time I've</p> <p>8 seen it.</p> <p>9 Q But do you understand it to be a map of</p> <p>10 Assembly District 93?</p> <p>11 A Yes.</p> <p>12 Q And I'll represent to you again that this is a</p> <p>13 document that was taken from an external hard</p> <p>14 drive assigned to Adam Foltz in 2010 and was</p> <p>15 created on June 18th, 2011.</p> <p>16 Do you understand the red outline to be the</p> <p>17 version of District 93 under the 2002 map?</p> <p>18 A Yes.</p> <p>19 Q And the yellow shading is the proposed district</p> <p>20 outline for District 93 under Act 43?</p> <p>21 A Yes.</p> <p>22 Q Can you explain why the boundaries of District 93</p> <p>23 were changed from the red outline to the yellow</p> <p>24 shaded area?</p> <p>25 A It's a requirement under state constitution</p>	

<p>Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 101</p> <p>1 section -- Article IV Section 6.</p> <p>2 Q It's a requirement for the specific boundaries to 3 be changed the way that they've been drawn in this 4 picture?</p> <p>5 A I don't know what the motivation is to change the 6 boundaries. I know that it's required under the 7 constitution to redistrict every ten years. How 8 that's done, the Assembly would not know that.</p> <p>9 Q And do you have any other information about the 10 motivations behind the drawing of Assembly 11 District 93?</p> <p>12 A No.</p> <p>13 Q Okay. I'll introduce what's been marked as 14 Exhibit 21. And do you recognize this to be a map 15 of Assembly District 10?</p> <p>16 A This is the first time I've seen this document, 17 but from what it looks like, it looks like at the 18 top of the page it says proposed plan, 19 redistricting draft for Assembly District 10.</p> <p>20 Q And do you understand the red outline to be the 21 Assembly District 10 under the 2002 map?</p> <p>22 A Yes.</p> <p>23 Q And then the blue shaded area here is the proposed 24 Assembly District 10 under Act 43?</p> <p>25 A Yes.</p>	<p>Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 103</p> <p>1 Q And then the pink shaded area here is the proposed 2 District 13 under Act 43?</p> <p>3 A Yes.</p> <p>4 Q Can you explain why the boundaries of District 13 5 were changed from the red outline to the pink 6 shaded area?</p> <p>7 A Under the state constitution Section -- Article IV 8 Section 6, it's a legislature requirement to 9 redistrict/reapportion every ten years.</p> <p>10 Q Can you explain specifically why the boundary of 11 District 13 was changed?</p> <p>12 A No.</p> <p>13 Q And do you have any other information about the 14 motivations behind the drawing of Assembly 15 District 13?</p> <p>16 A No.</p> <p>17 Q All right. I'll hand you what's been marked as 18 Exhibit 23. And do you recognize this to be a map 19 of District 18?</p> <p>20 A This is the first time I've seen this map of the 21 draft for District 18. And by looking at it, it 22 does look like a plan for District 18.</p> <p>23 Q All right. And I'll represent to you that this is 24 another document that we pulled from the external 25 hard drive assigned to Adam Foltz in 2010 and was</p>
<p>Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 102</p> <p>1 Q Can you explain why the boundaries of District 10 2 were changed from the red outline to the blue 3 shaded area?</p> <p>4 A Requirement under Article IV Section 6 that the 5 legislature redistrict every ten years.</p> <p>6 Q And do you have any other information about the 7 motivations behind the drawing of 8 Assembly District 10?</p> <p>9 A No.</p> <p>10 Q I'll hand you what's been marked as Exhibit 22. 11 And do you recognize this to be a map of 12 Assembly District 13?</p> <p>13 A This is the first time I've seen this proposed 14 plan for District 13.</p> <p>15 Q Do you understand it to be a map of 16 Assembly District 13?</p> <p>17 A Yes.</p> <p>18 Q And I'll represent to you again that this is a 19 document that was taken from the external hard 20 drive assigned to Adam Foltz in 2010 and was 21 created on June 18th, 2011.</p> <p>22 Do you understand the red outline to be the 23 outline of District 13 under the 2002 Assembly 24 map?</p> <p>25 A Yes.</p>	<p>Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 104</p> <p>1 created on June 18th, 2011.</p> <p>2 Do you understand that the red outline is the 3 version of District 18 under the 2002 map?</p> <p>4 A Yes.</p> <p>5 Q And then the dark green shaded area is the 6 proposed district outline for Assembly District 18 7 under Act 43?</p> <p>8 A Yes.</p> <p>9 Q Do you know why the boundaries of District 18 were 10 changed from the red outline to the dark green 11 shaded area?</p> <p>12 A It's the legislature's requirement to do 13 redistricting every ten years under Article IV 14 Section 6 of the state constitution.</p> <p>15 Q Do you have any other information about the 16 motivations behind the drawing of Assembly 17 District 18?</p> <p>18 A No.</p> <p>19 Q All right. I'll hand you what's been marked as 20 Exhibit 24. And do you recognize this to be a map 21 of Assembly District 62?</p> <p>22 A Once again, this is the first time I've seen this 23 particular document map for District -- Assembly 24 District 62.</p> <p>25 Q And I'll represent to you that this is another</p>

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<p>1 document that we pulled from an external hard 2 drive assigned to Adam Foltz in 2010 and was 3 created on June 18th, 2011.</p> <p>4 Do you understand the red outline to be the 5 version of Assembly District 62 under the 2002 6 map?</p> <p>7 A Yes.</p> <p>8 Q And then the proposed District 62 under Act 43 is 9 in maroon shading here on the map?</p> <p>10 A Yes.</p> <p>11 Q Can you explain why the boundaries of District 62 12 were changed from the red outline to the maroon 13 shaded area?</p> <p>14 A Other than it's the legislature's requirement to 15 redistrict/reapportion every ten years under state 16 constitution Article IV Section 6.</p> <p>17 Q And do you have any other information about the 18 motivations behind the drawing of Assembly 19 District 62?</p> <p>20 A No.</p> <p>21 Q All right. I'll hand you what's been marked as 22 Exhibit 25. And do you recognize this to be a map 23 of Assembly District 70?</p> <p>24 A Once again, this is the first time I've seen this 25 map document for Assembly District -- proposed</p>		<p>1 A This is the first time I've seen this proposed map 2 document for Assembly -- proposed District 3 Assembly District 77.</p> <p>4 Q But you understand it to be a map of Assembly 5 District 77?</p> <p>6 A Yes.</p> <p>7 Q And I'll represent to you that this is a document 8 we pulled from the external hard drive assigned to 9 Adam Foltz in 2010 and that it was created on 10 June 18th, 2011.</p> <p>11 Do you understand the red outline to be the 12 version of District 77 under the 2002 map?</p> <p>13 A Yes.</p> <p>14 Q And then the area outlined in purple shading is 15 the proposed District 77 under Act 43?</p> <p>16 A Yes.</p> <p>17 Q And can you explain why the boundaries of 18 district -- the boundary of District 77 was 19 changed from the red outline to the purple shaded 20 area?</p> <p>21 A Other than requirement by the state constitution 22 Article IV Section 6 that the legislature do 23 redistricting/reapportionment every ten years.</p> <p>24 Q And do you have any other information about the 25 motivations behind the drawing of Assembly</p>	
Videotaped Deposition of PATRICK E. FULLER 3-29-19	Page 106	Videotaped Deposition of PATRICK E. FULLER 3-29-19	Page 108
<p>1 district change for Assembly District 70.</p> <p>2 Q And I'll represent to you this is a document that 3 we pulled from an external hard drive assigned to 4 Adam Foltz in 2010 and that was created on 5 June 18th, 2011.</p> <p>6 Do you understand the red outline to be the 7 version of District 70 under the 2002 map?</p> <p>8 A Yes.</p> <p>9 Q And then the Act 43 proposed District 70 appears 10 on this map in light purple shading; correct?</p> <p>11 A That's what it looks like on this paper, yes.</p> <p>12 Q Can you explain why the boundaries of District 70 13 were changed from the red outline to the light 14 purple shaded area?</p> <p>15 A It's the legislature's requirement under the 16 constitution to redistrict/reapportion every ten 17 years, and it's under the state constitution of 18 Article IV Section 6.</p> <p>19 Q And do you have any other information about the 20 motivations behind the drawing of Assembly 21 District 70?</p> <p>22 A No.</p> <p>23 Q I'll hand you what's been marked as Exhibit 26. 24 And do you recognize this to be a map of 25 Assembly District 77?</p>		<p>1 District 77?</p> <p>2 A No.</p> <p>3 Q I'll hand you what's been marked as Exhibit 27. 4 And do you understand this to be a map of 5 Assembly District 80?</p> <p>6 A First time I've seen this map document 7 redistricting draft for Assembly bill -- 8 Assembly District 80.</p> <p>9 Q Do you understand it to be a map of 10 Assembly District 80?</p> <p>11 A Yes.</p> <p>12 Q And then I'll represent to you again that this was 13 taken from Adam Foltz's hard drive that was 14 assigned in 2010 and was created on June 18th of 15 2011.</p> <p>16 Do you understand the red outline to be the 17 version of District 80 under the 2002 map?</p> <p>18 A Yes.</p> <p>19 Q And then do you understand the pink shaded area to 20 be the proposed Assembly District 80 under Act 43?</p> <p>21 A Yes.</p> <p>22 Q Can you explain why the boundaries of District 80 23 were changed from the red outline to the pink 24 shaded area?</p> <p>25 A Other than being required by the state</p>	

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<p>1 constitution Article IV Section 6, the 2 legislature's requirement to redistrict every ten 3 years, reapportionment.</p> <p>4 <b>Q Do you have any other information about the 5 motivations behind the drawing of 6 Assembly District 80?</b></p> <p>7 A No.</p> <p>8 <b>Q I hand you what's been marked as Exhibit 28. Do 9 you recognize this to be a map of Assembly 10 District 94?</b></p> <p>11 A Once again, this is the first time I've seen this 12 draft for Assembly District 44 (sic), but as I 13 look at it, yes.</p> <p>14 <b>Q And I'll represent to you that this is a document 15 that was taken from the external hard drive 16 assigned to Adam Foltz in 2010 and was created on 17 June 18th, 2011.</b></p> <p>18 <b>Do you understand the red to be the version 19 of Assembly District 94 under the 2002 map?</b></p> <p>20 A Yes.</p> <p>21 <b>Q And then the dark purple shaded area is the 22 proposed district outline for Assembly District 94 23 under Act 43?</b></p> <p>24 A Yes.</p> <p>25 <b>Q Why were the boundaries of District 94 changed</b></p>	<p>1 <b>District 95 under Act 43?</b></p> <p>2 A Yes.</p> <p>3 <b>Q Can you explain why the boundaries of District 95 4 were changed from the red outline to the pink 5 shaded area?</b></p> <p>6 A Other than the requirement by the state 7 constitution Article IV Section 6 that the 8 legislature do redistricting every ten years.</p> <p>9 <b>Q And do you have any other information about the 10 motivations behind the drawing of Act 95?</b></p> <p>11 A No.</p> <p>12 <b>Q Or drawing of District 95?</b></p> <p>13 <b>MR. ST. JOHN:</b> Object to form. Did 14 you want to ask the full question again for a 15 clean record?</p> <p>16 <b>MS. HARLESS:</b> Sure.</p> <p>17 <b>Q Do you have any other information about the 18 motivations behind the redrawing of District 95?</b></p> <p>19 A No.</p> <p>20 <b>Q Besides what we've talked about today, do you have 21 any other information about the motivations for 22 the drawing of any of the assembly districts?</b></p> <p>23 A Other than it's required by the state constitution 24 Article IV Section 6 where it's required that the 25 legislature redistrict/reapportionment every ten</p>
Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 110	Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 112
<p>1 <b>from the red outline to the dark purple shaded 2 area?</b></p> <p>3 A Requirement by the state constitution Article IV 4 Section 6 that the legislature do 5 redistricting/reapportionment every ten years.</p> <p>6 <b>Q Do you have any other information about the 7 motivations behind the drawing of Assembly 8 District 94?</b></p> <p>9 A No.</p> <p>10 <b>Q All right. I'll hand you what's been marked as 11 Exhibit 29. And do you understand this to be a 12 map of Assembly District 95?</b></p> <p>13 A Once again, this is the first time I've seen this 14 redistricting draft for Assembly District 95. But 15 yes, by looking at the map for Assembly 16 District 95, yes.</p> <p>17 <b>Q Okay. And I'll represent that this was another 18 document taken from the external hard drive 19 assigned to Adam Foltz in 2010 and was created on 20 June 18th, 2011.</b></p> <p>21 <b>Do you understand the red outline to be the 22 version of District 95 under the 2002 map?</b></p> <p>23 A Yes.</p> <p>24 <b>Q And then do you understand that the pink shaded 25 area is the proposed outline for Assembly</b></p>	<p>1 years.</p> <p>2 <b>MR. ST. JOHN:</b> May I ask the 3 reporter to read back just the last question 4 and answer.</p> <p>5 (Question and answer read)</p> <p>6 <b>Q Do you have any other information about the 7 motivations for the drawing of Act 43 as a whole 8 that we haven't talked about yet today?</b></p> <p>9 A No.</p> <p>10 <b>MS. HARLESS:</b> Did you guys want to 11 take a lunch break?</p> <p>12 <b>MR. ST. JOHN:</b> How are you feeling?</p> <p>13 <b>THE WITNESS:</b> Whatever you guys 14 want to do.</p> <p>15 (Discussion off the record)</p> <p>16 By Ms. Harless:</p> <p>17 <b>Q So let's look back at Exhibit 1 which is the 18 subpoena with the list of topics. And if you want 19 to flip to the Exhibit A in there that lists the 20 topics out. And can you read Topic No. 2, please.</b></p> <p>21 A "The identity of the persons involved in the 22 drawing of each district in 2011 Wisconsin Act 43, 23 including earlier drafts."</p> <p>24 <b>Q What information do you have about the identity of 25 persons involved in drawing -- in the drawing of</b></p>

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<p>1   <b>Act 43 as a whole?</b></p> <p>2 A The Assembly does not know the identity of persons 3    involved in the drawing of each district. The 4    Assembly does not keep a log of what every 5    legislator and legislative staff do in their 6    office. The Assembly does not know and we do 7    not -- the Assembly does not know of any drafts. 8    The only -- the only thing that the Assembly knows 9    is the final draft that was introduced by the 10   Assembly Org on 11 July 2011.</p> <p>11 Q <b>Did the Assembly pay any invoices to anyone 12    involved in the Act 43 redistricting process?</b></p> <p>13 A So the question is does the Assembly pay persons 14    or did they pay for a contract?</p> <p>15 Q <b>Let's start with persons.</b></p> <p>16 A If they were a state employee, they were paid as a 17    state employee. Out -- external individuals were 18    not paid by the Assembly.</p> <p>19 Q <b>Who were external individuals paid by?</b></p> <p>20 A What was the question again?</p> <p>21 Q <b>Who were external individuals paid by?</b></p> <p>22 A The Assembly didn't pay them. I don't know who 23    paid them.</p> <p>24                   <b>MR. ST. JOHN:</b> External individuals 25    paid by what, for whom?</p>	<p>1   <b>member's staff involved in the drawing of Act 43?</b></p> <p>2 A No. I don't know what the legislative staff, what 3    the representatives do to the legislative staff. 4    They're not required to log their daily activities 5    with the Assembly.</p> <p>6 Q <b>And do you know if there are any other state 7    offices that were involved in the drawing of 8    Act 43?</b></p> <p>9 A No.</p> <p>10 Q <b>Was Governor Scott Walker's office involved in the 11    drawing of Act 43?</b></p> <p>12 A He may have been, but this is -- by the 13    constitution Article IV Section 6 the legislature 14    has to do redistricting. Whether Governor Walker 15    and his office -- the governor's office was 16    involved, I couldn't tell you that.</p> <p>17 Q <b>Do you know the identity of any consultants who 18    were involved in the drawing of Act 43?</b></p> <p>19 A No, I don't.</p> <p>20 Q <b>Do you know if anyone associated with the 21    Republican National Committee was involved in the 22    drawing of Act 43?</b></p> <p>23 A No. The Assembly wouldn't know that.</p> <p>24 Q <b>All right. Now I want to know if there are 25    individuals involved in the drawing of particular</b></p>
Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 114	Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 116
<p>1                   <b>MS. HARLESS:</b> Well, that's what he 2    said.</p> <p>3                   <b>MR. ST. JOHN:</b> Can the last 4    question, please, get repeated.</p> <p>5                   (Last question and answer read)</p> <p>6 Q <b>And then you also mentioned -- you said individual 7    persons or contracts. Who did the Assembly pay 8    under contract?</b></p> <p>9 A I don't know exactly who we paid in contract. The 10   contract was produced. I don't know exactly who 11   we paid for, what law firm we paid for 12   redistricting.</p> <p>13 Q <b>Which contract are you referring to?</b></p> <p>14 A I'm referring to the contract for redistricting 15   act -- Senate Bill 148, Act 43.</p> <p>16 Q <b>And who is that contract with?</b></p> <p>17 A I don't recall.</p> <p>18 Q <b>Okay. And you don't know the identity of any 19    persons involved with that contract?</b></p> <p>20 A No. No, I don't.</p> <p>21 Q <b>And you don't know the identity of any individual 22    Assembly members involved with the drawing of 23    Act 43?</b></p> <p>24 A No, I don't.</p> <p>25 Q <b>Do you know the identity of any individual</b></p>	<p>1   <b>districts in Act 43. And we can go through them 2    one-by-one. Can you give me the name of every 3    individual involved in the drawing of 4    Assembly District 4?</b></p> <p>5 A No.</p> <p>6 Q <b>Can you give me the name of every individual 7    involved in the drawing of Assembly District 10?</b></p> <p>8 A No.</p> <p>9 Q <b>Can you give me the name of any individual 10   involved in the drawing of Assembly District 10?</b></p> <p>11 A No, I have no idea what the legislators and 12   legislative staff do. The Assembly would not know 13   that. They're not required to log in with the 14   Assembly. And we don't -- the Assembly does not 15   maintain their work schedule. Individual 16   representatives do that.</p> <p>17 Q <b>Okay. So if I go through this list and ask you 18   the same question for all these assembly 19   districts, would your answer be different?</b></p> <p>20 A It would be the same.</p> <p>21 Q <b>Okay. So let me just list out the numbers and you 22   can just tell me if your answer would be 23   different. So Assembly District 13?</b></p> <p>24 A Same.</p> <p>25 Q <b>Assembly District 18?</b></p>

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<p>1 A Same.</p> <p>2 Q Assembly District 21?</p> <p>3 A Same.</p> <p>4 Q Assembly District 22?</p> <p>5 A Same.</p> <p>6 Q Assembly District 23?</p> <p>7 A The same.</p> <p>8 Q Assembly District 24?</p> <p>9 A Would be the same.</p> <p>10 Q Assembly District 25?</p> <p>11 A The legislature would not know -- the Assembly 12 would not know. The Assembly does not record what 13 individual staff or electors do. They do not log 14 that with the Assembly.</p> <p>15 Q Okay. And that's the same --</p> <p>16 A That's the same as at the beginning. I just want 17 to make sure that we understand it hasn't changed.</p> <p>18 Q Yeah. So I'm just trying to ask for any of these 19 Assembly Districts if your answer would be 20 different. But for the record, I just want to go 21 through each district.</p> <p>22 A Okay.</p> <p>23 Q So let me know if your answer would be different 24 for any of these districts than what you've said.</p> <p>25 Would your answer be the same for Assembly</p>	<p>1 A Yes.</p> <p>2 Q Would your answer be the same for Assembly 3 District 63?</p> <p>4 A Yes.</p> <p>5 Q Would your answer be the same for Assembly 6 District 66?</p> <p>7 A Yes.</p> <p>8 Q Would your answer be the same for Assembly 9 District 67?</p> <p>10 A Yes.</p> <p>11 Q What about District 70?</p> <p>12 A My answer would be the same. The Assembly does 13 not log what every individual in every office does 14 on a daily basis. It's not the Assembly's 15 requirement to know that.</p> <p>16 Q Would your answer be the same for Assembly 17 District 77?</p> <p>18 A Yes.</p> <p>19 Q Would your answer be the same for Assembly 20 District 80?</p> <p>21 A Yes.</p> <p>22 Q Would your answer be the same for Assembly 23 District 86?</p> <p>24 A Yes.</p> <p>25 Q Would your answer be the same for Assembly</p>
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<p>1 District 26?</p> <p>2 A Yes.</p> <p>3 Q Would your answer be the same for Assembly 4 District 29?</p> <p>5 A Yes.</p> <p>6 Q Would your answer be the same for Assembly 7 District 31?</p> <p>8 A Yes.</p> <p>9 Q Would your answer be the same for Assembly 10 District 35?</p> <p>11 A Yes.</p> <p>12 Q Would your answer be the same for Assembly 13 District 38?</p> <p>14 A Yes.</p> <p>15 Q Would your answer be the same for Assembly 16 District 42?</p> <p>17 A Yes.</p> <p>18 Q Would your answer be the same for Assembly 19 District 50?</p> <p>20 A Yes.</p> <p>21 Q Would your answer be the same for Assembly 22 District 56?</p> <p>23 A Yes.</p> <p>24 Q Would your answer be the same for Assembly 25 District 62?</p>	<p>1 District 88?</p> <p>2 A Yes.</p> <p>3 Q Would your answer be the same for Assembly 4 District 93?</p> <p>5 A Yes.</p> <p>6 Q Would your answer be the same for Assembly 7 District 94?</p> <p>8 A Yes.</p> <p>9 Q And would your answer be the same for Assembly 10 District 95?</p> <p>11 A Yes.</p> <p>12 Q Do you have any other information relating to this 13 topic that we haven't discussed yet today?</p> <p>14 A No. Just once again, I want to reiterate, the 15 Assembly does not log individual staff member's 16 day-to-day duties or operations or what electors 17 do. It's not a requirement by the Assembly.</p> <p>18 Q All right. So let's go back to the list we have 19 here of topics. And will you read Topic No. 3 20 into the record. Can you read it into the record.</p> <p>21 A "The objective facts that any Assembly Person had 22 access to or relied on each drawing -- when 23 drawing each district in 2011 Wisconsin Act 43, 24 including earlier drafts."</p> <p>25 Q What information do you have about the objective</p>

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<p>1   <b>fact that any Assembly Persons had access to or</b>  2   <b>relied on when drawing each district in 2011</b>  3   <b>Wisconsin Act 43?</b></p> <p>4 A The Assembly does not have any information on what  5    individual staff for individual electors do.  6    They're not required to log in with the Assembly.  7       So to answer your question, the Assembly  8       would have no knowledge of any of that.</p> <p>9 Q <b>So you're saying you have no knowledge at all</b>  10   <b>about any of the objective facts that were</b>  11   <b>considered during the drawing of Act 43?</b></p> <p>12 A That's correct.</p> <p>13 Q <b>All right. And so if we went through a list of</b>  14   <b>single individual districts, would your answer be</b>  15   <b>the same?</b></p> <p>16 A It would be the same. The Assembly is not  17    required and does not log what individual  18    legislators or their staff do on a daily basis.  19    That's not part of what the Assembly's required to  20    know. And we don't maintain that information.</p> <p>21 Q <b>Okay. So if I went through a list similar to the</b>  22   <b>one we just went through, would your answer be the</b>  23   <b>same for each one?</b></p> <p>24 A The answer would be the same for each one.</p> <p>25 Q <b>Okay. All right. Let's look at Topic No. 4. And</b></p>	<p>1   <b>Act 43?</b></p> <p>2 A The only -- computers were issued to the majority  3    and minority party through LTSB redistricting  4    computers.</p> <p>5 Q <b>And did you ever maintain custody over any of</b>  6   <b>those computers?</b></p> <p>7 A I never had custody. They were custody for the  8    majority and minority party. The only custody  9    came about is when I had to pick up a computer  10    from Representative Kessler's office due to a  11    court case, the Baldus case. I had to escort it  12    over to the LTSB cage to keep it locked up.</p> <p>13 Q <b>Okay. And did you ever observe anyone physically</b>  14   <b>damaging any of the nine hard drives associated</b>  15   <b>with the legislative redistricting computers?</b></p> <p>16 A No.</p> <p>17 Q <b>Were you ever told any information about physical</b>  18   <b>damage to any of the nine hard drives associated</b>  19   <b>with the legislative redistricting computers?</b></p> <p>20 A No.</p> <p>21 Q <b>Did you ever have any conversations with anyone</b>  22   <b>about the partisan consequences of any drafts of</b>  23   <b>Act 43?</b></p> <p>24 A No.</p> <p>25 Q <b>Have you ever had any conversations with any of</b></p>
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<p>1   <b>can you read that topic into the record.</b></p> <p>2 A No. 4, "Your involvement, if any, with the  3    drawing, passage, and/or enactment of Wisconsin  4    Act 43."</p> <p>5 Q <b>As chief clerk, were you involved in any way with</b>  6   <b>the drawing of Act 43?</b></p> <p>7 A No. The Assembly is not -- was not involved in  8    the drawing.</p> <p>9 Q <b>But were you as the chief clerk?</b></p> <p>10 A No.</p> <p>11 Q <b>You didn't have any -- you in no way interacted</b>  12   <b>with the legislature in the drawing of Act 43?</b></p> <p>13 A No. The chief clerk does not have anything to do  14    with drawing of the maps.</p> <p>15 Q <b>Okay. Did you ever receive any invoices relating</b>  16   <b>to the drawing of Act 43?</b></p> <p>17 A As previously mentioned, the only invoice I  18    received was one invoice -- I want to say six or  19    seven months -- that we paid. I want to say we  20    paid \$200,000 for those -- for redistricting. And  21    that would be the only thing that the clerk was  22    involved in as far as -- we didn't even draw them  23    but paying for redistricting.</p> <p>24 Q <b>Did you have any role in managing the legislative</b>  25   <b>computers that were used for the drawing of</b></p>	<p>1   <b>your staff about the drawing of Act 43?</b></p> <p>2 A No. When we -- are we talking the Assembly or the  3    chief clerk?</p> <p>4 Q <b>Staff of your office.</b></p> <p>5 A No.</p> <p>6 Q <b>What about staff of individual members of the</b>  7   <b>Assembly?</b></p> <p>8 A No.</p> <p>9 Q <b>Did you ever have any conversations about the</b>  10   <b>drawing of Act 43 with any individual members?</b></p> <p>11 A No.</p> <p>12 Q <b>Did you ever have any conversations with</b>  13   <b>individual members about the partisan consequences</b>  14   <b>of any drafts of Act 43?</b></p> <p>15 A No.</p> <p>16 Q <b>Did you ever visit the map room in Michael Best &amp;</b>  17   <b>Friedrich's law firm?</b></p> <p>18 A No.</p> <p>19 Q <b>Did you ever see any printouts of draft maps?</b></p> <p>20 A No.</p> <p>21 Q <b>Did you ever see any printouts of individual</b>  22   <b>district maps during the drafting process?</b></p> <p>23 A Give me that question again.</p> <p>24 Q <b>Did you ever see any printouts of individual</b>  25   <b>district maps --</b></p>

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<p>1 A No.</p> <p>2 Q -- during the drafting process? Besides what we</p> <p>3 discussed, can you think of any other ways that</p> <p>4 you were involved with the drafting of Act 43?</p> <p>5 MR. ST. JOHN: Do you mean you</p> <p>6 being the state Assembly or you being chief</p> <p>7 clerk with respect to this question?</p> <p>8 Q Let's start with you as the chief clerk.</p> <p>9 A No.</p> <p>10 Q Okay. Besides what we discussed earlier, are</p> <p>11 there any other ways that the Assembly was</p> <p>12 involved with the drafting of Act 43?</p> <p>13 A The Assembly as an institution was not, other than</p> <p>14 required by the state constitution to -- at</p> <p>15 Section 6 to do redistricting. As far as drafting</p> <p>16 goes, the Assembly did not -- was not involved.</p> <p>17 Q As chief clerk, were you involved with the passage</p> <p>18 of Act 43?</p> <p>19 A Yes.</p> <p>20 Q How?</p> <p>21 A We received the Senate Bill 148 from the Senate</p> <p>22 on -- it was messaged over on July 19th, 2011. On</p> <p>23 July 20th, 2011, it was brought up on the floor of</p> <p>24 the Assembly. There were a number of motions.</p> <p>25 There was one motion by Representative Zamarripa</p>		<p>1 (Exhibit No. 30 marked for</p> <p>2 identification)</p> <p>3 Q And so this is Exhibit 30. Do you recognize this</p> <p>4 document?</p> <p>5 A This looks like the bill history for Senate</p> <p>6 Bill 148.</p> <p>7 Q Okay. And does this come from the Assembly</p> <p>8 Journal?</p> <p>9 A Yes, it did.</p> <p>10 Q And do you maintain the Assembly Journal?</p> <p>11 A The clerk's -- this did not come from the Journal,</p> <p>12 excuse me. The bill history stays with the bill.</p> <p>13 Q Okay.</p> <p>14 A But this is produced by the clerk staff of both</p> <p>15 the Senate and the Assembly.</p> <p>16 Q And have you seen this document before?</p> <p>17 A Yes, I have.</p> <p>18 Q All right. And so I'd like you to take a look at</p> <p>19 the section that's with the header history. So</p> <p>20 can you just generally tell me what the history</p> <p>21 section tells us?</p> <p>22 A The history section tells you anything that</p> <p>23 happened to the bill as it went through the</p> <p>24 legislative process. As you look at it, it was</p> <p>25 introduced by the Assembly Org Committee on</p>	
Videotaped Deposition of PATRICK E. FULLER 3-29-19	Page 126	Videotaped Deposition of PATRICK E. FULLER 3-29-19	Page 128
<p>1 to return it to a committee and that was defeated.</p> <p>2 And then Representative Staskunas did a point of</p> <p>3 order that the Senate bill was not properly -- was</p> <p>4 not properly before us and it violated the</p> <p>5 Voting Rights Act of 1965. The speaker pro tem,</p> <p>6 at that time presiding officer and</p> <p>7 Representative Kramer voted against that. And</p> <p>8 that's in the Journal. Representative Barca</p> <p>9 introduced -- with a number of Democratic</p> <p>10 legislators -- introduced Assembly substitute</p> <p>11 amendment 1 and that was defeated by a vote of 59</p> <p>12 to -- 58 to 49. And then Representative Krusick</p> <p>13 put in Assembly amendment 1 that was defeated</p> <p>14 97 -- 96 to 1.</p> <p>15 The bill was read a third time and brought up</p> <p>16 for passage, and the final -- the final vote on</p> <p>17 that bill was 59 -- 57 to 40.</p> <p>18 Q Okay.</p> <p>19 A After that, it was immediately messaged back to</p> <p>20 the Senate. So as far as passage goes, that was</p> <p>21 the extent of the Assembly's involvement in</p> <p>22 passage of the bill, Senate Bill 148.</p> <p>23 Q So let's talk a little bit about some of the stuff</p> <p>24 you just mentioned.</p> <p>25</p>	<p>1 July 19th, 2011. When the committee met they put</p> <p>2 an amendment on it. Later on in the process it</p> <p>3 had a public notice and Senator Zipperer put an</p> <p>4 amendment 2 on it. Executive action was taken,</p> <p>5 and it went to the -- it was voted out of</p> <p>6 committee on the 15th, and it was scheduled for</p> <p>7 hearing on the Senate floor on the 19th.</p> <p>8 Okay. Go ahead.</p> <p>9 Q No. Go ahead.</p> <p>10 A The Senate bill just gives you a good synopsis of</p> <p>11 everything that happened to this piece of</p> <p>12 legislation as it went through the legislative</p> <p>13 process.</p> <p>14 Q All right. So I want to look at the entries of</p> <p>15 July 20th, 2011. And so if we go to the third</p> <p>16 entry that's dated July 20th, I think that's on</p> <p>17 the next page, the second page of the document.</p> <p>18 And can you read what that entry says?</p> <p>19 A "Point of order that the bill's not properly</p> <p>20 before the Assembly because it violates</p> <p>21 Voting Rights Act of 1965 and the United States</p> <p>22 Constitution not well taken."</p> <p>23 Q You referred to this earlier. Do you know what</p> <p>24 this entry's referring to?</p> <p>25 A It's referring to Representative Staskunas</p>		

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<p>1 bringing up a point of order that the bill was not 2 properly before the Assembly, that it should be 3 sent back because it's violating the Voting Act 4 Rights of 1965 and the state -- and the 5 U.S. Constitution.</p> <p>6 <b>Q And do you know why the point of order was made 7 besides what was written there?</b></p> <p>8 A I don't know what -- why Representative Staskunas 9 made that point of order.</p> <p>10 <b>Q And what does this entry mean when it says the 11 "point of order was not well taken"?</b></p> <p>12 A The decision of the chair, that being 13 Representative Kramer, made the decision that as 14 he reviewed the point of order, he looked at the 15 prior precedent and he looked at the statute, and 16 he found that it was not well taken, that it does 17 not violate the U.S. Constitution.</p> <p>18 <b>Q And which -- do you know which political party 19 Representative Kramer belonged to?</b></p> <p>20 A Representative Kramer -- there was a speaker 21 pro tem that was elected by the entire body. He 22 was a Republican.</p> <p>23 <b>Q So I'd like to move to the sixth entry that has 24 the date July 20th and it starts with Assembly 25 substitute amendment 1. And it says that</b></p>		<p>1 "Analysis By the Legislative Reference Bureau." 2 <b>Do you see that second paragraph?</b> 3 A In section 1? 4 <b>Q On the first page under the heading "Analysis By 5 the Legislative Reference Bureau."</b> 6 A Yes. 7 <b>Q The second paragraph. Can you read that second 8 paragraph into the record, please.</b> 9 A "This substitute amendment creates" -- 10 <b>Q Yes. Just do it slowly because she has to write 11 it down. That's correct. Just read it slower so 12 she can get it down.</b> 13 A "This substitute amendment creates a new procedure 14 for the preparation of legislative and 15 congressional redistricting plans. This 16 substitute amendment requires the Legislative 17 Reference Bureau and the Government Accountability 18 Board to jointly develop standards for legislative 19 and congressional districts based on population 20 requirements under the Wisconsin Constitution and 21 U.S. Constitution and requirements under Section 2 22 of the voting acts right -- Voting Rights Act. 23 One of the standards must be electoral 24 competitiveness of the districts. The substitute 25 amendment then directs the LRB and the GAB to draw</p>	
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<p>1 <b>substitute amendment was offered by various 2 representatives.</b> 3 <b>What was Assembly substitute amendment 1?</b> 4 A I couldn't tell you what Assembly substitute 5 amendment 1 was unless I pulled the actual bill 6 out and took a look at it. 7 <b>Q All right. We can mark an exhibit. Let her mark 8 it first and then I'll give it to you. Sorry. 9 (Exhibit No. 31 marked for 10 identification)</b> 11 <b>Q So I'm handing you what's been marked as 12 Exhibit 31. Do you recognize this document?</b> 13 A I'm sure I do. I don't remember it specifically. 14 It was brought up on the floor on the 20th of July 15 2011. 16 <b>Q And at the top there does it say "Assembly 17 Substitute Amendment 1 --</b> 18 A Yes. 19 <b>Q -- To 2001 Senate Bill 148"?</b> 20 A Yes. 21 <b>Q And do you understand it to be the text of 22 Assembly substitute amendment 1?</b> 23 A Yes. 24 <b>Q Okay. And I'd like to direct you to the second 25 paragraph of the body underneath the heading</b></p>		<p>1 redistricting plans for submission to the 2 legislature for approval in accordance with the 3 standards. Under the substitute amendment, no 4 later than January 1 of the second year following 5 the decennial federal census, the LRB and GAB must 6 deliver to the majority party of the Senate and 7 the speaker of the Assembly identical bills 8 embodying a plan for legislative and congressional 9 redistricting." 10 <b>Q What is your understanding of that paragraph, of 11 substitute amendment 1?</b> 12 A My understanding of this paragraph is that 13 redistricting is taking it out of the 14 legislature's hands and giving it to two 15 organizations -- two other organizations, that 16 being the LRB and the GAB. 17 <b>Q And then it says there that substitute amendment 1 18 would have required that electoral competitiveness 19 of the districts be one of the standards 20 considered in the state's redistricting process; 21 correct?</b> 22 A That's what it says, yes. 23 <b>Q Okay. So let's -- now let's go back to the 24 previous exhibit we were looking at, which I 25 believe was Exhibit 30, which is the legislative</b></p>	

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<p>1 history of the bill. And then that same entry we 2 were looking at where amendment substitute 1 was 3 offered lists a series of representatives. Are 4 all of those representatives -- were all of those 5 representatives Democratic members of the Assembly 6 at the time?</p> <p>7 A Yes.</p> <p>8 Q And then the very next entry following that -- 9 still with the date July 20th, 2011 -- says 10 "Assembly substitute amendment 1 laid on the 11 table, ayes 58, nos 39"; is that correct?</p> <p>12 A That's correct.</p> <p>13 Q What does "laid on the table" in this context 14 mean?</p> <p>15 A That means that the bill's not voted on. It's 16 just put aside for future consideration and it was 17 voted on.</p> <p>18 Q What was voted on?</p> <p>19 A To table the amendment.</p> <p>20 Q Did any Democrats vote to table Assembly 21 substitute amendment 1?</p> <p>22 A By looking above, no, because they all -- it looks 23 like they all were part of co-sponsors of the 24 substitute amendment.</p> <p>25 Q I'm going to introduce another exhibit. She has</p>	<p>1 A Correct.</p> <p>2 Q Were you involved with the public hearing that was 3 held regarding Act 43 on July 13th, 2011?</p> <p>4 A No.</p> <p>5 Q Do you know if the map drawers incorporated any 6 comments in that hearing into what became the 7 final Assembly map?</p> <p>8 A What was your question again?</p> <p>9 Q Do you know if the map drawers incorporated any 10 comments from that public hearing into what became 11 the final Assembly map?</p> <p>12 A No. I didn't attend the public hearing, so I 13 wouldn't know.</p> <p>14 Q Besides what we discussed already, are there any 15 other ways you were involved with the passage of 16 Act 43?</p> <p>17 A No.</p> <p>18 MS. HARLESS: All right. Is this a 19 good place for --</p> <p>20 THE WITNESS: Yes, yes.</p> <p>21 THE VIDEOGRAPHER: Going off the 22 record at 12:06. Microphones are off. (Recess for lunch)</p> <p>24 THE VIDEOGRAPHER: And we're back 25 on the record at 12:39.</p>
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<p>1 to mark it first and then we'll hand it to you. 2 (Exhibit No. 32 marked for 3 identification)</p> <p>4 Q And I'm handing you what's been marked as 5 Exhibit 32. Do you know what this document is?</p> <p>6 A Yes.</p> <p>7 Q What is it?</p> <p>8 A It's the voting record for tabling Assembly 9 substitute amendment 1.</p> <p>10 Q And after referencing this document, can you 11 confirm that no Democrats voted to table Assembly 12 substitute amendment 1?</p> <p>13 A That's correct.</p> <p>14 Q And did every Republican that was present vote to 15 table substitute amendment 1?</p> <p>16 A Yes.</p> <p>17 Q Was substitute amendment 1 ever called up again 18 for a vote after being laid on the table?</p> <p>19 A No.</p> <p>20 Q All right. Let's go back to Topic 4 which is what 21 we were talking about before. And we were talking 22 about how as chief clerk you were involved with 23 the passage of Act 43. And you said -- then you 24 explained the process of how the bill was 25 received; correct?</p>	<p>1 By Ms. Harless:</p> <p>2 Q So before we took a quick lunch break, we were 3 talking about Topic No. 4 in Exhibit 1. That 4 was -- it's Exhibit A to Exhibit 1 that lists the 5 topics. Do you see that?</p> <p>6 A Topic 4?</p> <p>7 Q Yes.</p> <p>8 A Do you want me to read it?</p> <p>9 Q No. You already read it, so that's great. I just 10 wanted to remind you what we were talking about. 11 And we've gone over that asks for your involvement 12 in the passage or enactment. And so I just wanted 13 to go over one more category, which is are there 14 any ways in which you were involved in the 15 implementation of Act 43?</p> <p>16 A The Assembly as far as implementation. When the 17 bill was passed on the 20th of July 2011, we 18 messaged it back to the Senate. As far as 19 enactment goes, the Senate took over from there 20 because it originated as a Senate bill. So as far 21 as the Assembly goes, as far as enactment goes, 22 other than making sure the bill history is correct 23 and the Journal, once it's sent back to the 24 Senate, they enroll it, they send it to the 25 governor for signature.</p>

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<p>1 Q So your office isn't involved in sending the bill 2 to the governor for signature?</p> <p>3 A No, not in this time because it was a Senate bill.</p> <p>4 Q Okay.</p> <p>5 A We messaged it back to the Senate.</p> <p>6 Q Okay. And then were you involved in the 7 implementation of Act 43 in any other way?</p> <p>8 A Not that I can think of as far as initially 9 enacting it. We would know who -- the new 10 legislators out of the new districts would come to 11 us. Other than that, no.</p> <p>12 Q When the new districts came to you, did you have 13 to do anything with them?</p> <p>14 A No, we would just put them -- we would find out -- 15 and this is later on in the process -- who would 16 be running in those districts. And after the 17 election we would know who the new representative 18 would be for 81st, 77th, whatever it is.</p> <p>19 As far as enactment goes, actually the 20 Assembly enacting the legislation, no.</p> <p>21 Q Let's turn to Topic No. 5. It's the next page in 22 that document, Exhibit 1-A. Can you read that 23 topic into the record, please.</p> <p>24 A No. 5, "Information about any communications or 25 other interactions between the Assembly and</p>	<p>1 question is no.</p> <p>2 Q Do you know whether there are any communications 3 between the Assembly and anyone associated with 4 the Redistricting Majority Project or REDMAP?</p> <p>5 A No. Other than that email that we were CC'd on 6 from Nick Probst.</p> <p>7 Q Is that the only document you found responsive to 8 that, to the document production request about 9 REDMAP, or did you find other documents?</p> <p>10 A That's the only document regarding REDMAP.</p> <p>11 Q And are you aware of any communications between 12 any individual member and the Republican National 13 Committee about the GOP Redistricting Conference?</p> <p>14 A No.</p> <p>15 Q What about between individual members about -- 16 individual members and anyone associated with the 17 Redistricting Majority Project?</p> <p>18 A No.</p> <p>19 Q And then do you know whether there are any 20 communications between individual Assembly members 21 or their staff and the Republican state 22 legislative committee?</p> <p>23 A Give me that question again.</p> <p>24 Q Do you know if there are any communications 25 between individual Assembly members or their staff</p>
Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 138	Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 140
<p>1 Republican National Committee GOP Redistricting 2 Conference or the organization known as the 3 Redistricting Majority Project (REDMAP)."</p> <p>4 Q Are you aware of any communications between the 5 Assembly and anyone associated with the Republican 6 National Committee about the Republican National 7 Committee's GOP Redistricting Conference?</p> <p>8 A We had one communication on an email that was sent 9 to Nick Probst in -- that I had. I can't remember 10 the date. I want to say 2003. And that was the 11 only communication we had regarding REDMAP.</p> <p>12 Q And we'll discuss that in a little -- that 13 communication in a little bit, but do you know 14 whether there are any communications between any 15 individual members and the national -- Republican 16 National Committee about the GOP Redistricting 17 Conference?</p> <p>18 A No.</p> <p>19 Q And do you know whether there are any 20 communications between the staff of any individual 21 members and the Republican National Committee 22 about the GOP redistricting conference?</p> <p>23 A No. Once again, as I mentioned before, staff and 24 legislators don't log with the Assembly on their 25 day-to-day operations. So the answer to your</p>	<p>1 and the Republican state legislative committee?</p> <p>2 A No. Once again as I mentioned, the clerk -- the 3 Assembly does not know communications between 4 individual legislators and their staff. It's not 5 a requirement of the Assembly to maintain records 6 of their communications or what they're doing on a 7 day-to-day basis.</p> <p>8 Q And do you know of any other interactions between 9 the Assembly and anyone associated with the 10 Republican National Committee about the Republican 11 National Committee's GOP Redistricting Conference?</p> <p>12 A No.</p> <p>13 Q Are you aware of any Assembly funds that were 14 expended for travel to the GOP Redistricting 15 Conference in April 2010?</p> <p>16 A No. After doing a search, both electronically and 17 paper copy, with my business as a legislative 18 specialist, we found no -- no documents of anybody 19 traveling to that conference.</p> <p>20 Q Did any Assembly members attend the April 2010 GOP 21 Redistricting Conference in Washington D.C.?</p> <p>22 A Say that -- give me the date again.</p> <p>23 Q Did any Assembly members attend the April 2010 GOP 24 Redistricting Conference in Washington, D.C.?</p> <p>25 A If they did, the Assembly did not pay -- did not</p>

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<p>1 use state funds to send anybody to that 2 conference.</p> <p>3 <b>Q</b> <b>And are you aware of any contracts between the</b> 4 <b>Assembly and any members of the Republican</b> 5 <b>National Committee for redistricting purposes?</b></p> <p>6 <b>A</b> No.</p> <p>7 <b>Q</b> Okay. Let's go back to the subpoena and let's 8 turn to the very last page of the subpoena again, 9 which is Exhibit 1 to Exhibit B. It's says 10 "Redistricting Essentials" at the top. And I'd 11 like to direct you back to the bottom of that 12 document where there's a set of names of five RNC 13 employees. Do you see that list?</p> <p>14 <b>A</b> Yes.</p> <p>15 <b>Q</b> <b>Did Tom Hofeller assist in any way with the</b> 16 <b>drawing of Act 43?</b></p> <p>17 <b>A</b> I would not know that.</p> <p>18 <b>Q</b> <b>Was Tom Hofeller ever consulted by any individual</b> 19 <b>Assembly member in the drawing of Act 43?</b></p> <p>20 <b>A</b> The Assembly would not know that.</p> <p>21 <b>Q</b> <b>Do you know whether any individual Assembly</b> 22 <b>member's staff consulted with Tom Hofeller about</b> 23 <b>Act 43?</b></p> <p>24 <b>A</b> Once again, the Assembly does not know what 25 individual staff or representatives do on a daily</p>	<p>1 write off on the voucher. And going through all 2 my records, fiscal records, we never paid that 3 individual.</p> <p>4 <b>Q</b> <b>Did Mike Wild assist in any way in the drawing of</b> 5 <b>Act 43?</b></p> <p>6 <b>A</b> I do not know.</p> <p>7 <b>Q</b> <b>Was Mike Wild ever consulted by any individual</b> 8 <b>Assembly member in the drawing of Act 43?</b></p> <p>9 <b>A</b> The Assembly would not know that. Once again, 10 legislative Assembly staff do not have to 11 coordinate with or let the Assembly know what 12 their day-to-day operations are, what they're 13 doing.</p> <p>14 <b>Q</b> <b>Did John Phillippe assist in any way in the</b> 15 <b>drawing of Act 43?</b></p> <p>16 <b>A</b> No.</p> <p>17 <b>Q</b> <b>And I'm assuming your answer would be the same</b> 18 <b>about whether any individual Assembly member has</b> 19 <b>consulted with John Phillippe?</b></p> <p>20 <b>A</b> That's correct. Once again as I mentioned, the 21 Assembly it's not a requirement. We don't require 22 staff to log what their day-to-day operations are, 23 activities are, as well as legislators to the 24 Assembly.</p> <p>25 <b>Q</b> <b>And did Leslie Rutledge assist in any way in the</b></p>
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<p>1 basis. It's not required for them to check in 2 with the Assembly or let us know.</p> <p>3 <b>Q</b> <b>Did Dale Oldham assist in any way in the drawing</b> 4 <b>of Act 43?</b></p> <p>5 <b>A</b> Once again, I do not know that either.</p> <p>6 <b>Q</b> <b>Do you know whether Dale Oldham has assisted in</b> 7 <b>any way with any of the litigation over Act 43?</b></p> <p>8 <b>A</b> Say that question again.</p> <p>9 <b>Q</b> <b>Do you know whether Dale Oldham has ever assisted</b> 10 <b>in any way with any of the litigation over Act 43?</b></p> <p>11 <b>A</b> I do not know that.</p> <p>12 <b>Q</b> <b>Has the Assembly ever retained Dale Oldham to</b> 13 <b>serve as counsel in the litigation that has</b> 14 <b>occurred over Act 43?</b></p> <p>15 <b>A</b> Not that I know of. I don't remember paying any 16 legal bills for this individual.</p> <p>17 <b>Q</b> <b>Do you know if the Assembly has ever retained</b> 18 <b>Dale Oldham as a consultant in the litigation that</b> 19 <b>has occurred over Act 43?</b></p> <p>20 <b>A</b> No. The Assembly -- the Assembly has never paid 21 any funds to Dale Oldham, either as a consultant 22 or as a -- on a contract.</p> <p>23 <b>Q</b> <b>That you're aware of or never -- or you just know</b> 24 <b>the Assembly has never paid Dale Oldham any funds?</b></p> <p>25 <b>A</b> The Assembly hasn't because I would have had to</p>	<p>1 <b>drawing of Act 43?</b></p> <p>2 <b>A</b> I do not know that.</p> <p>3 <b>Q</b> <b>Has the Assembly ever retained Leslie Rutledge to</b> 4 <b>serve as counsel in any of the litigation that has</b> 5 <b>occurred over Act 43?</b></p> <p>6 <b>A</b> To my knowledge, the Assembly has never retained 7 him as far as paying state funds or Assembly funds 8 to this individual.</p> <p>9 <b>Q</b> <b>Has the Assembly ever retained Leslie Rutledge as</b> 10 <b>a consultant in any of the litigation that has</b> 11 <b>occurred over Act 43?</b></p> <p>12 <b>A</b> The Assembly has not.</p> <p>13 <b>Q</b> All right. Let's move to -- let's go back to the 14 list of topics which is in Exhibit A again. And 15 let's go to Topic No. 6. Can you read that topic 16 into the record, please.</p> <p>17 <b>A</b> No. 6, "The identity and duties of all Assembly 18 Persons who are involved in your associated 19 activities from 2002 to the present."</p> <p>20 <b>MR. ST. JOHN:</b> Can I just note for 21 the record we object to this topic as being 22 vague and ambiguous and overbroad.</p> <p>23 But with that objection, go ahead.</p> <p>24 Proceed.</p> <p>25 <b>Q</b> And let's -- I want -- so you can understand what</p>

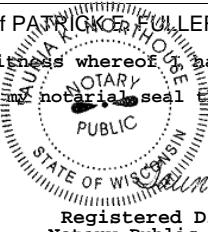
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<p>1 this topic is referring to, let's look back -- if      2 you flip back one page -- actually two -- no, one      3 page there's definitions right above the list of      4 topics and there's the letter H. Can you read      5 that paragraph?</p> <p>6 A Letter H, "Associational activity meaning      7 recruiting candidates, registering voters, raising      8 campaign funds for Republican Assembly candidates      9 or the Republican Party of Wisconsin persuading      10 independents and other voters to vote for      11 Republican Assembly candidates, advocating and      12 implementing preferred legislative policies, and      13 organizing volunteers."</p> <p>14 Q Thank you. With that definition in mind, do you      15 have any information about Topic 6?</p> <p>16 A Topic 6 is prohibited under the JCLO rule of      17 11 October 2001, as well as the ethics board at      18 that time memo to all legislators 5 November 2003.      19 It's also in the policy manual under the      20 ethics -- ethics tab of what is considered      21 campaign activity. And your definition is all      22 related to campaign activity, and it's prohibited      23 in the Assembly rules.</p> <p>24 Q So you're saying that the Assembly does not engage      25 in any of the associational activities --</p>		<p>1 successful or unsuccessful."</p> <p>2 Q Do you know of any Republican Assembly members who      3 are involved in recruitment of Republican      4 candidates for the Assembly?</p> <p>5 A Once again, the Assembly is prohibited from any      6 type of recruitment under the JCLO rule      7 11 October 2001, the Assembly rules, as well as      8 the ethics board memo of 5 November 2003.</p> <p>9 Q Do you know of any individual Republican Assembly      10 members who are involved in the recruitment of      11 Republican candidates for the Assembly?</p> <p>12 A No. Once again, I reiterate it's against the JCLO      13 rule 11 October 2001 to do any of this type of      14 activity on state time.</p> <p>15 Q Is Robin Vos involved in the recruitment of      16 Republican candidates for the Assembly?</p> <p>17 A I don't know what Robin Vos does. It's not part      18 of what the Assembly needs to know.</p> <p>19 Q Is Robin Vos involved with the Wisconsin      20 Republican Assembly Campaign Committee?</p> <p>21 A I'm not -- I do not know what Robin Vos -- who      22 he's associated with. Once again, the Assembly      23 does not need that information -- does not know      24 that information.</p> <p>25 Q Do you have any other information about this topic</p>	
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<p>1 A That's correct.</p> <p>2 Q -- listed here?</p> <p>3 A It's prohibited.</p> <p>4 Q Do individual Republican members of the Assembly      5 engage in any of these associational activities?</p> <p>6 A I don't know if individual Assembly members do or      7 staff. If they do, they cannot be on -- they      8 cannot be on state time.</p> <p>9 Q Would any individual Republican members of the      10 Assembly have information about this topic?</p> <p>11 A Once again, I don't want to speculate one way or      12 the other. I do not know.</p> <p>13 Q Besides what we discussed today, do you have any      14 other information about this topic?</p> <p>15 A No, other than it's -- I will reiterate it's      16 against Assembly rules and the JCLO rule of      17 11 October 2001, associated activities as defined      18 in No. H is prohibited.</p> <p>19 Q All right. Let's move to Topic No. 7. Will you      20 read that topic into the record, please.</p> <p>21 A No. 7, "The identity of Assembly persons who are      22 involved in recruiting Republican candidates for      23 the Assembly from 2002 to the present, the      24 prospective candidates those persons contacted for      25 recruitment purposes, whether such recruitment was</p>		<p>1 that we haven't yet discussed today?</p> <p>2 A No. I just want to reiterate once again,      3 recruiting candidates is against the Assembly      4 rule -- against the JCLO rule 11 October 2001.</p> <p>5 Q Let's turn to Topic No. 8. And can you read that      6 into the record, please.</p> <p>7 A No. 8, "Meetings, communications or conversations      8 from 2002 to the present relating to recruiting      9 Republican candidates for the Assembly."</p> <p>10 Q What information do you have about this topic?</p> <p>11 A Once again, this falls -- recruiting candidates      12 falls under JCLO rule 11 October 2001. It's      13 prohibited, also under the Assembly rules, also      14 under the ethics board memo of 5 November 2003.      15 That type of activity is prohibited.</p> <p>16 Q Do you know if any individual Republican members      17 of the Assembly would have information about this      18 topic?</p> <p>19 A No.</p> <p>20 Q Would Robin Vos have information about      21 communications relating to recruiting Republican      22 candidates for the Assembly?</p> <p>23 A I would not know what Robin Vos knows regarding      24 recruitment of candidates. It's not an      25 Assembly -- it's not an Assembly requirement that</p>	

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<p>1 we know what Robin Vos is doing.</p> <p>2 Q <b>Besides what we've talked about today, do you have</b></p> <p>3 <b>any other information about this topic?</b></p> <p>4 A No. Once again, I reiterate, it's against the</p> <p>5 Assembly rules. It's against the JCLO rule of</p> <p>6 11 October 2001.</p> <p>7 Q <b>Let's move to Topic No. 9. And can you read that</b></p> <p>8 <b>topic into the record, please.</b></p> <p>9 A No. 9, "Any criteria that you used from 2002 to</p> <p>10 the present to access -- to assess whether a</p> <p>11 candidate's qualified or highly qualified to run</p> <p>12 for office."</p> <p>13 Q <b>Do you have any information about this topic?</b></p> <p>14 A Once again, I'll go back to the JCLO rule of</p> <p>15 11 October 2001. We do not assess the quality of</p> <p>16 a candidate, whether a candidate is -- can run for</p> <p>17 office. This is campaign-related activity which</p> <p>18 is prohibited.</p> <p>19 Q <b>Do you know if any individual Republican members</b></p> <p>20 <b>of the Assembly would have information about this</b></p> <p>21 <b>topic?</b></p> <p>22 A I would not speculate to guess if any legislator</p> <p>23 would have any of this information, no.</p> <p>24 Q <b>Do you think it's likely that an individual member</b></p> <p>25 <b>of the Assembly has information about this topic?</b></p>	<p>1 A I don't know. The Assembly doesn't know either.</p> <p>2 Q <b>Would Robin Vos have information about the</b></p> <p>3 <b>solicitation of campaign contributions for</b></p> <p>4 <b>Republican Assembly candidates?</b></p> <p>5 A Once again, I would not want to speculate what</p> <p>6 Speaker Vos knows or does not know.</p> <p>7 Q <b>Besides what we've talked about today, do you have</b></p> <p>8 <b>any other information on this topic?</b></p> <p>9 A No.</p> <p>10 Q <b>All right. Let's go to Topic 11. Can you read</b></p> <p>11 <b>that topic into the record, please.</b></p> <p>12 A No. 11, "The nature and number of communications</p> <p>13 made by any Assembly Persons between 2002 and the</p> <p>14 present that solicited campaign contributions to</p> <p>15 you, the RPW, or to any individual Republican</p> <p>16 candidate. The categories of communications as</p> <p>17 used in this request include but not limited to</p> <p>18 emails, mailings, photo solicitations,</p> <p>19 person-to-person solicitations and fundraising</p> <p>20 events."</p> <p>21 Q <b>Do you have any information about this topic?</b></p> <p>22 A Once again, this is -- all these -- these</p> <p>23 soliciting campaign contributions and</p> <p>24 communications on state time is prohibited under</p> <p>25 JCLO rule 11 October 2001, the Assembly rules, and</p>
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<p>1 A Once again, I'm not going to try to speculate one</p> <p>2 way or the other what a legislator knows or does</p> <p>3 not know.</p> <p>4 Q <b>And besides what we've talked about today, do you</b></p> <p>5 <b>have any other information about this topic?</b></p> <p>6 A No.</p> <p>7 Q <b>All right. Let's move to Topic 10. Can you read</b></p> <p>8 <b>that topic into the record, please.</b></p> <p>9 A "The identity and role of all Assembly Persons who</p> <p>10 solicited campaign contributions for the Assembly</p> <p>11 or individual Republican candidates for the</p> <p>12 Assembly from 2002 to the present."</p> <p>13 Q <b>Do you have any information about this topic?</b></p> <p>14 A Once again, we go back to the JCLO rule of</p> <p>15 11 October 2001, ethics board memo of</p> <p>16 5 November 2003, and Assembly rules. And this is</p> <p>17 campaign-related activity that's strictly</p> <p>18 prohibited under our rules.</p> <p>19 Q <b>Do you know if any individual Republican members</b></p> <p>20 <b>of the Assembly would have information about this</b></p> <p>21 <b>topic?</b></p> <p>22 A Once again, I do not want to speculate what</p> <p>23 Republican candidates know or do not know. So my</p> <p>24 answer would be no.</p> <p>25 Q <b>No or I don't know?</b></p>	<p>1 ethics board memo of 5 November 2003 that all</p> <p>2 staff -- all staff members sign.</p> <p>3 Q <b>And do you know whether any individual Republican</b></p> <p>4 <b>members of the Assembly would have information</b></p> <p>5 <b>about this topic?</b></p> <p>6 A I do not want to speculate what Assembly members</p> <p>7 know or do not know or if they have any</p> <p>8 information regarding these -- No. 11.</p> <p>9 Q <b>Would Speaker Vos have information about the</b></p> <p>10 <b>number of communications soliciting campaign</b></p> <p>11 <b>contributions to Republican candidates?</b></p> <p>12 A Once again, I don't want to speculate what</p> <p>13 Representative -- what Speaker Vos knows or does</p> <p>14 not know as far as communication go regarding</p> <p>15 fundraising activities.</p> <p>16 Q <b>And besides what we've talked about today, do you</b></p> <p>17 <b>have any other information on this topic?</b></p> <p>18 A Just finally that it's all prohibited under JCLO</p> <p>19 rule, no campaign activity on state time using</p> <p>20 state resources.</p> <p>21 Q <b>Let's move to Topic No. 12, and can you read that</b></p> <p>22 <b>topic into the record, please.</b></p> <p>23 A No. 12, "The ability and efforts of you to</p> <p>24 fundraise for Republican Assembly candidates from</p> <p>25 2002 to the present."</p>

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<p>1 Q <b>Do you have any information about this topic?</b></p> <p>2 A No. The Assembly is -- under JCLO rule</p> <p>3 11 October 2001 is prohibited from doing any type</p> <p>4 of fundraising on state time using state</p> <p>5 resources. Additionally, ethics board memo of</p> <p>6 5 November 2003 states the same thing. It's</p> <p>7 prohibited and specifically states under one of</p> <p>8 the illustrated -- illustrations there that</p> <p>9 fundraising for campaigns is strictly prohibited.</p> <p>10 Q <b>Would Robin Vos have information about the ability</b></p> <p>11 <b>to fundraise for Republican Assembly candidates</b></p> <p>12 <b>from 2002 to present?</b></p> <p>13 A What Speaker Vos knows, does not know, I will not</p> <p>14 speculate regarding fundraising activities, if he</p> <p>15 knows any of that.</p> <p>16 Q <b>Besides what we've talked about today, do you have</b></p> <p>17 <b>any other information about this topic?</b></p> <p>18 A Just once again, reiterate fundraising is</p> <p>19 prohibited under Assembly rules and JCLO rules of</p> <p>20 11 October 2001.</p> <p>21 Q <b>All right. Let's go to Topic 13. And can you</b></p> <p>22 <b>read that into the record, please.</b></p> <p>23 A No. 13, "The identity and role of all Assembly</p> <p>24 persons who are responsible for organizing</p> <p>25 volunteers in each Assembly election between 2002</p>	<p>1 present."</p> <p>2 MR. ST. JOHN: I just want to</p> <p>3 repeat our objection that that topic is</p> <p>4 vague, ambiguous, and overbroad.</p> <p>5 Q <b>Do you have any information about this topic</b></p> <p>6 <b>today?</b></p> <p>7 A Looking by -- looking at your definition of</p> <p>8 associated activities, it's prohibited under</p> <p>9 11 October 2001 JCLO rule, ethics board memo of</p> <p>10 5 November 2003, and Assembly rules as they're</p> <p>11 written in the policy manual.</p> <p>12 Q <b>And do you know if Robin Vos would have any</b></p> <p>13 <b>information about the associational activities</b></p> <p>14 <b>engaged in by Assembly Republicans?</b></p> <p>15 A I will not speculate what Speaker Vos knows or</p> <p>16 does not know regarding associated activities.</p> <p>17 Q <b>Besides what we've talked about today, do you have</b></p> <p>18 <b>any other information about this topic?</b></p> <p>19 A Once again, I'll just reiterate under your</p> <p>20 definition H of associated activities, it's</p> <p>21 prohibited against -- by JCLO rule, ethics board</p> <p>22 memo, and the Assembly policy manual of</p> <p>23 campaigning on state time using state resources.</p> <p>24 Q <b>So let's look -- still that document, but let's go</b></p> <p>25 <b>back to the document production requests which is</b></p>
Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 154	Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 156
<p>1 to the present."</p> <p>2 Q <b>Do you have any information about this topic?</b></p> <p>3 A Once again, this is prohibited under the JCLO rule</p> <p>4 11 October 2001, ethics board memo of</p> <p>5 5 November 2003, the Assembly rules, that</p> <p>6 organizing is campaign related, and it's</p> <p>7 prohibited under the rules using state time on</p> <p>8 state resources.</p> <p>9 Q <b>Do you know if Robin Vos would have information</b></p> <p>10 <b>about the organizing of volunteers in each</b></p> <p>11 <b>Assembly election between 2002 and the present?</b></p> <p>12 A I'll not speculate what Speaker Vos knows</p> <p>13 regarding organizing volunteers for Assembly</p> <p>14 elections.</p> <p>15 Q <b>And besides what we've talked about today, do you</b></p> <p>16 <b>have any other information about this topic?</b></p> <p>17 A Once again, I'll reiterate it's against Assembly</p> <p>18 rules, JCLO rule, and the ethics board of</p> <p>19 organizing volunteers on state time using state</p> <p>20 resources for election campaign activity.</p> <p>21 Q <b>All right. Let's go to the final topic which is</b></p> <p>22 <b>No. 14. And can you read that into the record,</b></p> <p>23 <b>please?</b></p> <p>24 A No. 14, "All associational activities engaged in</p> <p>25 by you or any Assembly persons from 2002 to the</p>	<p>1 <b>Exhibit B. And earlier we were discussing --</b></p> <p>2 MR. ST. JOHN: Counsel, for one</p> <p>3 moment, I think you said document requests</p> <p>4 are Exhibit B --</p> <p>5 MS. HARLESS: Exhibit B of</p> <p>6 Exhibit 1.</p> <p>7 MR. ST. JOHN: Okay. I just wanted</p> <p>8 the record to be clear. Thanks.</p> <p>9 MS. HARLESS: Yeah.</p> <p>10 Q <b>Earlier we were talking about document request</b></p> <p>11 <b>No. 7 and No. 9, and I believe you mentioned that</b></p> <p>12 <b>you had produced a document, an open records</b></p> <p>13 <b>request in relation to those requests; is that</b></p> <p>14 <b>true?</b></p> <p>15 A That is correct.</p> <p>16 MS. HARLESS: I'm going to mark an</p> <p>17 exhibit here.</p> <p>18 (Exhibit No. 33 marked for</p> <p>19 identification)</p> <p>20 Q <b>And, Mr. Fuller, I'm handing you a document that</b></p> <p>21 <b>was marked as Exhibit 33. Have you seen this</b></p> <p>22 <b>document before?</b></p> <p>23 A Yes.</p> <p>24 Q <b>What is this document?</b></p> <p>25 A This is a document that was requested in an open</p>

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<p>1 records request to produce any documents relating 2 to a number of different individuals, Republican 3 State Leadership Committee and so on. If you read 4 on page 2 of this REDMAP, Paul Ray, and so on.</p> <p>5 <b>Q And does your office keep all open records 6 requests that it processes?</b></p> <p>7 A No.</p> <p>8 <b>Q Do you have a policy about which requests you keep 9 or not?</b></p> <p>10 A The policy in open records requests are anything 11 fiscal will be kept for three sessions, per diem 12 and district miles, travel. All other open 13 records are retained for the session, and after 14 that they are not retained, after that session.</p> <p>15 <b>Q So they're retained for the current session?</b></p> <p>16 A The current session, that's correct.</p> <p>17 <b>Q And so this document is from 2013; correct?</b></p> <p>18 A That's correct.</p> <p>19 <b>Q So why does your office still have this document?</b></p> <p>20 A This was -- I retained this. This was on my 21 electronic documents, and I did not do a very good 22 job of policing all my open records. When I found 23 this one from 2003 (sic), I had to beat myself up 24 a little bit because I wasn't following my own -- 25 the Assembly's policy.</p>	<p>1 received that requested similar documents before 2 that time period?</p> <p>3 A No.</p> <p>4 Q All right. Let's go back to the first page of the 5 document. And let's look at the email at the top 6 that's dated January 21st, 2013. This is a reply 7 email to Mr. Fischer's request; correct?</p> <p>8 A Correct.</p> <p>9 Q And in the "from" line of this email it says "Probst, Nick." Who is Nick Probst?</p> <p>10 A Nick Probst at the time was the speaker's on-staff 11 attorney.</p> <p>12 <b>Q And you're CC'd on this email; correct?</b></p> <p>13 A Correct.</p> <p>14 <b>Q Why are you CC'd on this email?</b></p> <p>15 A Open records the clerk's office is always CC'd 16 just to know that if we have to -- if we have to 17 have that individual come and pay for records, we 18 can process the request and get payment for them.</p> <p>19 <b>Q Okay. And in the body of the email, in the second 20 paragraph, it says, "Your request is being 21 processed and a response will be prepared."</b></p> <p>22 <b>Do you see that?</b></p> <p>23 A Yes.</p> <p>24 <b>Q Do you know if a response was ever produced to</b></p>
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<p>1 <b>Q How long has that policy been in place?</b></p> <p>2 A I want to say eight to ten years.</p> <p>3 <b>Q All right. Let's look at the bottom of the page 4 marked as WSA 0000001 because that is where the 5 first email in this chain starts. And that email 6 is dated January 4th, 2012; correct?</b></p> <p>7 A Correct.</p> <p>8 <b>Q What is Mr. Fischer requesting in this open 9 records request?</b></p> <p>10 A He's requesting "access to, and a copy of, all 11 records containing the following words: 12 Republican State Leadership Committee, RSLC, 13 Redistricting Majority Project, REDMAP, 14 Mark Braden, Paul Ray, Eric McLeod, Tom Hofeller, 15 Dan Oldham, Mark Jefferson, Mike Wild, American 16 Justice Partnership, Mike Grebe, Ed Gillespie." 17 He's asking "any and all correspondence with 18 individuals or organizations whose email address 19 ends in rnchq.org and whose email address ends 20 with mchq.org."</p> <p>21 <b>Q And he's requesting those documents from the time 22 period of October 1, 2012, through January 4th, 23 2012; correct?</b></p> <p>24 A That's correct.</p> <p>25 <b>Q Do you know if there are any open records requests</b></p>	<p>1 <b>Mr. Fischer regarding this public document 2 request?</b></p> <p>3 A I can't speculate one way or the other, but I 4 suspect -- and once again I don't want to 5 speculate, but if it wasn't -- if a response 6 wasn't prepared, the requester would have came 7 back and said something to Nick about it.</p> <p>8 <b>Q And your office doesn't retain copies of any 9 produced responses; correct?</b></p> <p>10 A No.</p> <p>11 <b>Q Do you know if any materials were withheld by 12 Speaker Vos's office in response to Mr. Fischer's 13 request?</b></p> <p>14 A No.</p> <p>15 <b>MS. HARLESS:</b> If we could just take 16 a couple-minute break.</p> <p>17 <b>MR. ST. JOHN:</b> Sure. Of course.</p> <p>18 <b>THE VIDEOGRAPHER:</b> Going off the 19 record at 1:10. Microphones are off.</p> <p>20 (Recess)</p> <p>21 <b>THE VIDEOGRAPHER:</b> We're back on 22 the record at 1:19.</p> <p>23 <b>MS. HARLESS:</b> So I've had a chance 24 to go through my notes and I don't have any additional questions for you.</p>

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<p>1                   <b>MR. KEENAN:</b> I have no questions.</p> <p>2                   <b>MR. ST. JOHN:</b> I just have a</p> <p>3                   couple, a couple of things I wanted to</p> <p>4                   clarify.</p> <p>5</p> <p>6                   <b>EXAMINATION</b></p> <p>7 By Mr. St. John:</p> <p>8 Q Ms. Harless showed you a series of maps earlier in</p> <p>9 your testimony; do you recall that?</p> <p>10 A Yes.</p> <p>11 Q Those maps were provided on Exhibits 3 through 29;</p> <p>12 is that correct?</p> <p>13 A That's correct.</p> <p>14 Q You had testified, at least with respect to some</p> <p>15 of them, that you had not seen them before. Had</p> <p>16 you seen any of the maps that were provided to you</p> <p>17 today as Exhibits 3 through 29 before today?</p> <p>18 A No. This is the first time I've seen any of those</p> <p>19 maps.</p> <p>20 Q And Ms. Harless represented that those maps were</p> <p>21 taken from a hard drive of Adam Foltz, and I</p> <p>22 believe that she gave a date July 18?</p> <p>23                   <b>MS. HARLESS:</b> I think it was</p> <p>24                   July 18, yes.</p> <p>25 Q They were taken from a --</p>	<p>1                   bill jacket as it was -- once it's introduced to</p> <p>2 the Senate, the Senate starts to take it up, it</p> <p>3 goes on the Senate Insight, and anybody can get on</p> <p>4 the Web page and see the maps, can see the whole</p> <p>5 bill online.</p> <p>6 Q Ms. Harless asked a series of questions about</p> <p>7 different districts that are reflected on</p> <p>8 Exhibits -- that appear to be reflected on</p> <p>9 Exhibits 3 --</p> <p>10 A Through 29.</p> <p>11 Q -- through 29; correct?</p> <p>12 A Correct.</p> <p>13 Q And 2011 Wisconsin Act 43 did change districts</p> <p>14 from a map in 2002 until -- I'm sorry, did change</p> <p>15 the districts -- Assembly legislative districts;</p> <p>16 is that correct?</p> <p>17 A That's correct. It's required by the constitution</p> <p>18 Article IV Section 6.</p> <p>19 Q And with respect to each district that was</p> <p>20 changed, is it the Assembly's testimony that it</p> <p>21 was -- that those districts were changed to comply</p> <p>22 with that constitutional requirement that it</p> <p>23 redistrict?</p> <p>24                   <b>MS. HARLESS:</b> Objection to form.</p> <p>25 Q You can answer if you understand the question.</p>
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<p>1 A June 18th.</p> <p>2 Q June 18th, 2011. That was taken from a hard drive</p> <p>3 of Adam Foltz. Would the Assembly as a whole have</p> <p>4 seen those maps as taken from the hard drive of</p> <p>5 Adam Foltz?</p> <p>6 A No.</p> <p>7 Q If there are graphic depictions such as maps that</p> <p>8 reflect the language in either Senate bill 1 --</p> <p>9 well, let me strike that and start over.</p> <p>10                  If there are graphic depictions such as maps</p> <p>11 reflecting the language of Senate Bill 148, would</p> <p>12 they have been attached to Senate Bill 148?</p> <p>13 A Yes.</p> <p>14 Q And would those maps then have been part of the</p> <p>15 bill file?</p> <p>16 A Yes, they would have.</p> <p>17 Q And if there were maps that reflected the language</p> <p>18 of Wisconsin Act -- or 2011 Wisconsin Act 43,</p> <p>19 would those graphic depictions be attached to 2011</p> <p>20 Wisconsin Act 43 as an appendix?</p> <p>21 A Yes.</p> <p>22 Q And in your capacity as chief clerk, you would</p> <p>23 have seen the maps that would have been attached</p> <p>24 to Senate Bill 148; is that correct?</p> <p>25 A That's correct. They come over with the bill, the</p>	<p>1 A The requirement is under the state constitution</p> <p>2 Section 4 as -- Article IV Section 6 that the</p> <p>3 legislature redistrict -- do a redistricting every</p> <p>4 ten years.</p> <p>5 Q And then were the -- so were the new districts</p> <p>6 drawn for the purpose of complying with that</p> <p>7 constitutional requirement?</p> <p>8 A Yes.</p> <p>9 Q I'm going to ask you to take a look at Exhibit 1</p> <p>10 which noticed certain documents -- I'm sorry,</p> <p>11 noticed certain topics to be prepared to testify</p> <p>12 about today. And I want to draw your attention to</p> <p>13 Topic No. 3. Ms. Harless had asked you to provide</p> <p>14 some testimony relating to objective facts that</p> <p>15 Assembly persons had when drawing each district in</p> <p>16 Act 43. You see that, Mr. Fuller, that topic?</p> <p>17 A I see No. 3, yes.</p> <p>18 Q Would the Assembly have access to any objective</p> <p>19 facts which were appended to Senate Bill 148 when</p> <p>20 it came to the body of the Assembly?</p> <p>21 A Yes. Every legislator, staff member that got on</p> <p>22 the computer, as well as the public, can access</p> <p>23 that bill history online and the appendix that</p> <p>24 comes with it, whether it's population data,</p> <p>25 whether it's the maps. All that's available in</p>

<p>Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 165</p> <p>1 the bill jacket that the Wisconsin public can 2 review.</p> <p>3 <b>MR. ST. JOHN:</b> Thank you. I have 4 no further questions.</p> <p>5 <b>MS. HARLESS:</b> I don't have any 6 additional questions.</p> <p>7 <b>MR. ST. JOHN:</b> Thank you.</p> <p>8 <b>THE VIDEOGRAPHER:</b> Going off the 9 record at 1:25. Microphones are off.</p> <p>10 11 (adjourning at 1:25 p.m.)</p> <p>12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>	<p>Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 167</p> <p>1 STATE OF WISCONSIN ) 2 ) ss. 3 COUNTY OF DANE ) 4 I, Taunia Northouse, a Registered Diplomate Reporter 5 and Notary Public duly commissioned and qualified in and 6 for the State of Wisconsin, do hereby certify that 7 pursuant to notice and subpoena, there came before me on 8 the 29th day of March 2019, at 8:58 in the forenoon, at 9 the offices of Urban Land Interests, 10 East Doty 9 Street, the City of Madison, County of Dane, and State 10 of Wisconsin, the following named person, to wit: 11 PATRICK E. FULLER, who was by me duly sworn to testify 12 to the truth and nothing but the truth of his knowledge 13 touching and concerning the matters in controversy in 14 this cause; that he was thereupon carefully examined 15 upon his oath and his examination reduced to typewriting 16 with computer-aided transcription; that the deposition 17 is a true record of the testimony given by the witness; 18 and that reading and signing was not waived. 19 I further certify that I am neither attorney 20 or counsel for, nor related to or employed by any of the 21 parties to the action in which this deposition is taken 22 and further that I am not a relative or employee of any 23 attorney or counsel employed by the parties hereto or 24 financially interested in the action. 25</p>
<p>Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 166</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>WITNESS CERTIFICATE</p> <p>I hereby certify that I read the foregoing transcript of my deposition given at the time and place aforesaid, and I do again subscribe and make oath that the same is a true, correct, and complete transcript of my deposition given, with corrections, if any, appearing on the attached correction sheet(s).</p> <p>_____ correction sheet(s) attached.</p> <p>PATRICK E. FULLER</p> <p>Subscribed and sworn to before me this _____ day of April 2019.</p> <p>Notary Public, State of Wisconsin.</p>	<p>Videotaped Deposition of PATRICK E. FULLER 3-29-19 Page 168</p> <p>1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p>In witness whereof, I have hereunto set my hand and affixed my notarial seal this 3rd day of April 2019.</p> <p>Taunia K. Northouse Registered Diplomate Reporter Notary Public, State of Wisconsin</p>  <p>My commission expires May 17, 2019</p>

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